From: Rees, Brian
Sent: Thursday, 24 May 2018 11:31 a.m.
To: regs@eeca.govt.nz
Subject: Implementation Update - Refrigerated display and storage cabinets - DUE COB 25 May … Comments (McAlpine Hussmann Limited)

Attention Emma Simons,

Good morning Emma,
Further to recent emails, we note below some comments / queries regarding the document 'Implementation Update Refrigerated display and storage cabinets May 2018.pdf' for consideration during your review. The below is intended to increase clarity for all stakeholders and is provided with our support for ongoing valid and realistic energy efficiency improvements:-

1. Page #7 of the May 2018 Implementation Update, can you confirm that NZ & AU will <u>not</u> adopt the EC Efficiency levels <u>until</u> they have been EU-EC ratified and published in Europe via EU Standards ?
    a. NOTE:- As AU/NZ are proposing to use data prepared by others (i.e. Europe, via ISO23953) it would be quite wrong to use only draft values and imperative we do not accept/mandate values that have been determined by other countries and potentially not yet been accepted by them.
        i. PS:- we note on Page #7 of the May 2018 Implementation Update that the draft EC MEPS levels are anticipated to be adopted by the end of 2018, if this date is achieved then no issues … if later then the 1st December 2019 AU/NZ mandatory start date may become a challenge for industry and Government alike.

2. Star Rating for RDC's (Page #9 of the May 2018 Implementation Update), can you please confirm that the Star rating index will be auto-calculated during the online MEPS/EEI registration process for each registration application?

3. Page #12 of the May 2018 Implementation Update, for low production/bespoke RDCs there is reference to 'Applicants will need to use a software package which enable the Carnot calculation to be validated.[8]' Can you please confirm whom supplies this software (i.e. embedded in the MEPS/EEI online registration process?) and whom the software supplier is and the name of the software?

4. Page #25 of the May 2018 Implementation Update (Attachment B) notes that 'In addition, cabinets without controls are required to be tested with lighting operating continuously during the test.' Remote RDC's are almost exclusively supplied by manufacturers without a controller, as the controller and its features and benefits to the end-user are often unique and hence supplied during on-site Remote RDC installations. The current AS1731 Standard allows the cabinet lights to be switched off by a manual light switch (fitted to the cabinet and easily accessible by the end-users staff) when undergoing Type Test 2 with Night Blinds Down as an example. Can you confirm the intention is to retain this important and

relevant energy feature (i.e. it promotes turning lights off when store is closed and also using Night Blinds which reduces total energy consumption).

5. Page #32 of the May 2018 Implementation Update (Attachment C, Item 6), the EEI calculation for low production/bespoke RDCs was our understanding to be a process/methodology for manufacturers to register cabinets where the financial test costs were prohibitive due to lack of amortisation potential. Yet this Attachment C reads that the REC component of the TEC is to be "The average heat extraction rate of the compressor was measured at 3.451 kW.' …. The only way to <u>measure</u> this value is to have the RDC in a test room, which defeats the idea of this registration approach alternate channel. Can you please clarify an acceptable heat extraction rate estimation that does not require a physical test room test?

Thank you for the opportunity to engage and submit comments, if any items require further clarification please do not hesitate to call or email.

Yours faithfully,

Brian R.

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