

Dear EEAT Secretariat,

**Department of the Environment and Energy
PO Box 787, CANBERRA, ACT 2601**

My name is Kyle Rafter and I am the National Product Manager at Fujitsu General (Aust.) Pty limited who is the manufacturer and importer of Fujitsu Air Conditioners. I would like to firstly thank you for the consultative approach taken regarding this consultation paper, including the public consultation sessions held in Sydney, Melbourne and Wellington. We have reviewed the paper and would like to highlight some key points below for your consideration:

- Firstly, Fujitsu General supports demand response and has supported programs such as Energex's peak smart program by implementing R&D measures to ensure our key products are demand response compliant under the requirements of AS/NZS4755.3.1. Therefore, Fujitsu believes the program is working well for Energex even without mandating compliance to AS/NZS4755.3.1
- The majority of Fujitsu's domestic equipment can comply with the 2012 variation of the standard; however, our products do not currently meet the 2014 standard. To comply with the 2014 standard would involve a large R&D investment and time to get our products ready
- We have concerns regarding mandating AS/NZS4755.2 as part of mandatory demand response for products sold in Australia & New Zealand. To make product that complies to this standard would firstly involve R&D time & cost to develop a solution that would comply. Moreover, additional cost would be added to the product to comply to this and could potentially lead to an overall lift in product prices depending on the solution devolved as part of the R&D. Realistically, due to time and resources we would not be able to comply to this standard by 1st of July 2021
- There will be investment by us & other manufacturers to ensure all our product under 19kW comply to AS/NZS4755.3.1 & AS/NZS4755.2, However, there is no commitment by Energy Service Providers that they will utilize the demand response capabilities and if they do which standard will they use
- As manufacturers we will be investing into DRED technology as part of this proposal, however it is not clear how many DRSPs will implement demand response measures
- Currently none of our VRF equipment is DRED ready, which is ranging from 12 to 135kW and is now commonly used in applications like apartments.

Finally, we would like to ask that time of implementation is considered, we need enough time to get all our products 19kW and under demand response ready. Discussions with our head office in Japan have indicated that anything implemented mandatory before 2022 would be challenging for us to comply to. Furthermore, please see answers to the questions in the consultation paper attached with this letter.

Regard, Kyle Rafter

Kyle Rafter
National Product Manager



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