

# JRAIA The Japan Refrigeration and Air Conditioning Industry Association

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13<sup>th</sup> September 2019

Dear Sir/Madam

## Comments on Consultation Paper 'Smart' Demand Response Capabilities for Selected Appliances

The Japan Refrigeration and Air Conditioning Industry Association (JRAIA), representing over 160 manufacturers of refrigeration and air-conditioning equipment in Japan welcomes the consultation paper issued in August 2019.

We support the basic policy of the consultation paper that intends to control power consumption during peak load period. However, JRAIA is highly concerned about some points in the consultation paper. We would appreciate if you could consider our comments given under your questions, respectively.

Attached, please find JRAIA's comments regarding the questions for stakeholders.

As key stakeholders, JRAIA would like to make further contributions whenever it is useful and needed and share the knowledge and experience of our member companies who have been dedicated to offering quality products to customers in Australia and New Zealand for decades. We remain at your disposal and look forward to working with you throughout this study.

Best Regards,



Hideaki Kasahara

Senior Manager, International Affairs Department

The Japan Refrigeration and Air Conditioning Industry Association (JRAIA)

### About JRAIA:

The Japan Refrigeration and Air Conditioning Industry Association (JRAIA) was originally established in February 1949 as the Japan Refrigerating Machine Manufactures Association which was thereafter reorganized in February 1969 to become an incorporated association and renamed as it is at present.

JRAIA represents over 160 manufacturers of refrigeration and air conditioning equipment in Japan. We, the members of JRAIA, have so far been dedicated to offering quality products to the markets of EU. JRAIA aims to promote and improve production, distribution and consumption of refrigeration and air conditioning equipment and their applied products, as well as auxiliary devices and components, automatic controls and accessories and thereby contribute to the steady development of HVAC&R industry and the improvement in people's standard of living. For more information, please see JRAIA's website [www.jraia.or.jp](http://www.jraia.or.jp)

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JRAIA's comments on "Questions for Stakeholders" provided in the Consultation Paper

**1. Do you support the proposal to mandate compliance with AS/NZS 4755 for the nominated priority appliances? Please give reasons.**

JRAIA oppose the proposal to mandate AS/NZS 4755 and we support option 2. We consider that the demand response should be optional. It is up to consumers to activate the demand response function during use, and if this demand response function becomes mandatory, it will lead to an increase in product prices, unfairly forcing consumers who do not activate the demand response function to also have to pay the cost. For the fairness to consumers, we support option 2.

**2.b. Do you agree that including demand response capabilities on energy efficiency labelling and voluntary compliance with AS/NZS 4755 is not a viable alternative option?**

No. JRAIA consider voluntary compliance with AS/NZS 4755 to be a viable option. The reason is same as question no.1.

Although we support voluntary compliance, if the authority decides to choose to mandate compliance with AS/NZS 4755, we strongly recommend applying AS/NZS 4755.3.1:2012 instead of AS/NZS 4755.3.1:2014, because we have concerns that the definition of "normal operation" in 2014 version is unclear.

**3. Do you support:**

**a. permitting compliance with either AS/NZS 4755.3 or (DR) AS 4755.2?**

**b. requiring compliance with all Demand Response Modes (DRMs)?**

a. JRAIA support AS / NZS 4755.3.1;2012. In addition, the demand response interface should not be limited to built-in-types, but also allow optional-accessory type also.

b. JRAIA support all demand response modes (DRM 1-3)

**4. Do you agree with the scope of the proposal:**

**a. air conditioners: up to 19 kW cooling capacity;**

**c. electric storage water heaters (excluding solar-electric and heat pump water heaters);<sup>71</sup> and d. charge/discharge controllers for electric vehicles (SAE Level 2 or IEC Mode 3).**

a. JRAIA considers that the scope for "air conditioners with cooling capacity up to 19kW" should be limited to air conditioners which the manufacturer declares as "residential-use". If the authority is considering including VRFs in this scope, please give careful consideration to the fact that there are VRF technical issues which may negatively impact the performance.

c. We agree to exclude heat pump water heaters from this scope

**14. Do you think the proposal would reduce competition among product suppliers, reduce consumer choice or lead to an increase in product prices (beyond what is expected to occur)?**

JRAIA believes that the proposal will lead to increases in product cost. (Refer to the answer for question no.1)

**15. If the measure is implemented, what is the earliest feasible date by which products could comply? How much lead time should there be after publication of the final requirements?**

JRAIA believes a transition period of least three years is required after publication. Manufacturers need time to change the specifications of current models in parallel to the R&D of new models.

**16. Do you consider that there are any major technical or functional issues related to the proposal? If so, how should these be addressed?**

Yes. Manufacturers need time to change the specifications of current models in parallel to the R&D of new models. JRAIA believes a transition period of least three years is required after publication.