

## SUBMISSION ON SMART DEMAND RESPONSE CAPABILITIES FOR SELECTED APPLIANCES

Email Submission by: MITSUBISHI HEAVY INDUSTRIES (20 Sept 2019)

Dear Sir/Madam

My name is Oscar Xu, I am the Product Engineer for Mitsubishi Heavy Industries Air Conditioners Australia (MHIAA) and the comments in this email represents MHIAA.

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

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

MHIAA oppose the proposal to mandate AS/NZS 4755 and we support option 2. We consider that the demand response should be voluntary. Air conditioner manufacturers currently offer demand response capability in more than 65% of the models on the market and MHIAA have most of our current line up already comply with AS/NZS 4755. Consequently, mandating demand response capability is unlikely to increase participation by consumers.

a. ~~Do you support~~ Do you support compliance with either AS/NZS 4755.3 or (DR) AS 4755.2?

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

MHIAA only supports compliance with AS/NZS 4755.3.1:2012. MHIAA support all demand response modes (DRM1-3) but does not support DRM4 or similar proposals because they seem to be very inefficient ways of using excess supply energy.

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. MHIAA considers that the scope for "air conditioners with cooling capacity up to 19kW" should not include Multi System Air Conditioner. If the authority is considering including these systems in this scope, please give careful consideration to the fact that there are many technical issues which may negatively impact the performance and reliability of the system.

c. MHIAA agree to exclude Heat pump water heaters from this scope.

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?

MHIAA 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.

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