



national
electrical and
communications
association

Integrated Energy Efficiency Retrofit Services

Accreditation for Individuals and Companies

Prepared by:
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Comments made are based on NECA's understanding of the proposed accreditation scheme as outlined below:

- NECA understands that the proposed accreditation system is designed to provide a reference point for companies, and more specifically Government departments, who wish to engage appropriately experienced and qualified companies to manage energy efficient retrofits.
- NECA understands that the intention is not to introduce legislation or regulations which will impact adversely on companies who opt not to undertake this accreditation.
- NECA understands that this accreditation is for the principal contractor only, and is not intended to include now or in the future any sub-contractors engaged to undertake the work.
- NECA members and electrical contracting businesses across the industry will be unlikely to satisfy the accreditation criteria, and therefore would only be involved as sub-contractors in the process.

General Comment:

There appears to be no benefit to be gained by the electrical contracting industry from the introduction of this scheme.

However, there are numerous negative impacts for the electrical industry, which include:

- Accreditation will only limit those managing the retrofit process and thus drive up the cost of project management.
- The system does not include sub-contractors and thus an accreditation system has no real influence on the type and quality of work.
- Adds to the bureaucracy of retrofitting.
- Smaller retrofits will need to be project managed by specialists and not trades people. Trades people will be limited to being subcontractors and not project managers on a small scale.
- Further regulation and an impost on business with no significant advantages.

Ongoing Accreditation

4.4 Key Questions

- 1. Are the critical processes that are required for a company to lead to an energy efficiency retrofit of a commercial building represented in the assessment criteria?*

Accreditation for a company to lead (manage) the retrofit process does not have any influence on the quality of the work being undertaken as many sub-contractors are involved. For example a past job may be highly energy efficient due to excellent sub-contractors or alternatively the managers may have the knowledge and undertaken high level modelling based on the technology to be installed yet the performance is not achieved due to poor work completed by sub-contractors.

2. *Is the level of experience required in this initial accreditation scheme appropriate for ensuring the quality of energy efficiency retrofits?*

As energy efficient retrofits are really only a fairly recent development, experience in this area does not necessarily mean that “experience” has any influence on the end result. Professional people have been trained in their fields and this should be all that is required to undertake energy efficient retrofits. For example recent training in energy efficiency may be more helpful than so called experience.

3. *Is the proposed method of assessment adequate for identifying the processes and experience of a company and is it appropriately outcome-focused?*

The method of assessment does not indicate the accreditation level that is required. Is it for all sub-contractors involved in the process or just the company managing the project? If it's just the managing company there are a myriad of sub-contractors involved and if it is to apply to call sub-contractors it is erroneous to think they need accreditation to install, for example, lighting, which is a basic function of an electrician for which they are already trained and regulated.

Assessment Criteria

5.5 Key Questions

1. *Are the critical skills that are required for an individual to lead an energy efficiency retrofit of a commercial building included in the assessment process of this proposed scheme?*

Applicants may have experience in many of the areas outlined in the skills criteria but may not cover all the criteria. For example ‘Understanding behaviour change options to achieve energy efficiency’ may not be applicable as these professionals are trained in technologies which bypass the need to change human behavior.

Also the maintenance criteria may not apply as the contract may just be for a retrofit of the building and the maintenance may be outsourced to another company.

2. *Is the level of competency in this initial accreditation scheme appropriate for ensuring the quality of energy efficiency retrofits and meeting demand?*

The demand for people with skills in managing the retrofit of commercial building will drive the market. An accreditation system will not have an affect on this demand or the level of the skills of the people who undertake such roles as this person will have to comply with existing standards for building and construction.

3. *Is the proposed method of assessment adequate for identifying the skills and level of competency?*

Yes the proposed method is more than adequate but this still does not address the need for such an accreditation system. The demand for such skills will be the driver for companies to increase their capabilities.

Proposed Models for Accreditation Scheme

6.6 Key Questions

1. *Are there any gaps in the descriptions of the two delivery models, Integrated Energy Efficiency Retrofit and EPC?*

The descriptions cover the full spectrum of what can be undertaken when retrofitting a commercial building. However, not every building retrofit will be extensive and some may only include HVAC, lifts or lighting. The concept of the EPC is a good one but legislation covered in the Trade Practices Act and business contracts would cover the need for an accreditation system.

2. *Do these models reflect the majority of energy efficiency retrofits being undertaken in Australia? This is necessary to ensure that the accreditation meets demand and is fit-for-purpose for existing energy efficiency programs?*

Retrofits are so varied it is difficult to categorize them under the one umbrella. In some cases electrical contracting businesses are employed to undertake tasks which could be categorized as a retrofit. Would they require accreditation? Accreditation alone will not meet the demand for the skills in this area. If anything an accreditation system will hinder the process and drive up the price of commercial retrofits. The fit-for-purpose aspect is ambiguous as retrofits can come in all shapes.

Application Process

7.4 Key Question

1. *Does the proposed assessment process provide you with confidence that it is fair, transparent, confidential and efficient?*

The proposed assessment process seems fair as the criteria are set at the beginning of the program. As for being transparent and confidential that is yet to be seen and can only be assessed once the program is up and running.

The biggest problem is that of efficiency. There is still no great reason as to why such an accreditation system should be introduced. Secondly, the time to apply and renew an individual or company accreditation just adds another level of bureaucracy to the contracting process.
