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29 April 2003

### **Submission to Mandatory Renewable Energy Target Review**

Dear Secretariat,

I would like to raise an issue with the current 'Guideline to Calculate RECs for Domestic Solar Water Heaters'.

For any given solar water heater, the RECs allocation for Zone 1 is calculated using the same weather data and input parameter profiles as for Zone 3 (Adelaide). I am wondering if this calculation methodology disadvantages consumers living in Zone 1.

Without being able to run the simulation for both the specified input values and for more realistic inputs such as weather profiles for Townsville or Rockhampton, it is difficult to judge if the Zone 1 residents are being disadvantaged. Has a comparison been performed to determine that consumers in the Zone 1 are not being disadvantaged? If so, would it be possible to obtain or view the results of the comparison on the ORER web-site.

We have in the past, calculated performance characteristics of our collector using inputs from AS4234-1994 and solar radiation profiles from "Condensed Solar Radiation Data Base for Australia, G.L. Morrison and A. Litvak, 1988". The results of this simulation suggest the collector displaces over 2 MWh more in Zone 1 than in Zone 3 over a ten year period (medium load). This is the basis for asking the question of 'Why is Zone 1 assessed using Adelaide (Zone 3) weather conditions?'

I was also like to ask why the specified collector azimuth of 45 degrees is used for the RECs calculation instead of north as in the previous AS4234 calculation of energy consumption.

Regards  
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