

1 April 2019

Lyndel Gray  
Chief Executive Officer  
Caravan, Camping & Touring Industry & Manufactured Housing Industry Association of NSW  
PO Box H114, Harris Park NSW 2150

Dear Ms Gray

**Submission on *Updating the regulatory frameworks for embedded networks* draft report (EMO0036)**

The AEMC would like to thank the Caravan, Camping & Touring Industry & Manufactured Housing Industry Association of NSW Ltd (CCIA NSW) for its submission to the AEMC's draft report on *Updating the regulatory frameworks for embedded networks*.

The AEMC is an independent and impartial organisation that highly values effective engagement with stakeholders, providing valuable input to our work program. We interact with individuals and organisations throughout each review and rule change process to build stakeholder awareness and understanding and provide an opportunity for meaningful input to inform our decision-making.

Against this background, we were surprised to see the following statement made by the CCIA NSW in its submission (page 4):

*"During our consultations with the AEMC and AER, regulatory officers have on more than one occasion described holiday parks and residential land lease communities as 'collateral damage'. This is an unfortunate outcome, but it is not irreversible."*

We strongly disagree that any AEMC regulatory officer has ever made such a statement and, as such, do not consider this to be an accurate reflection of discussions between the CCIA and the AEMC. In developing an enhanced regulatory framework for embedded networks, the AEMC has had – and continues to have – regard to all forms of embedded networks.

I note that, elsewhere in the submission, the CCIA explains that many of the proposed changes in the draft report will not likely impact new residential land lease communities in NSW but that, nevertheless, it continues to have concerns with the new regulatory approach and requests a meeting with the AEMC to discuss these. I have asked my team to make arrangements but, in the meantime, if you have any queries please contact Andrew Truswell, Director, on (02) 8296 0637 or via email at [andrew.truswell@aemc.gov.au](mailto:andrew.truswell@aemc.gov.au).

Yours sincerely



Richard Owens  
Executive General Manager