

Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235



Submitted online at [www.aemc.gov.au](http://www.aemc.gov.au)

AEMC Ref: ERC0179

23 June 2015

Dear Commissioners,

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**RE: Embedded Networks Rule Change Request Consultation**

Thank you for the opportunity to comment on the Embedded Networks Rule Change Request Consultation.

As the peak body for the community services sector in South Australia, SACOSS has a long-standing interest in the delivery of essential services. Our advocacy is informed by our members; organisations and individuals who witness the access and equity issues in our community.

SACOSS supports changes to regulatory arrangements for embedded networks which will provide customers within embedded networks with access to retail competition. SACOSS supports arrangements which will enable the transfer of customers from retailers and setting up and maintaining data for the embedded network within NEM systems, including provision of information on life support customers to the required market participants.

While SACOSS is broadly supportive of the rule change proposal by AEMO, we note that the proposal is silent on the issue of consumer protections for these embedded networks customers with access to retail competition. SACOSS believes that further investigation needs to occur to determine whether embedded networks customers who choose their own retailer will have full access to the consumer protection framework of the authorised retailer, including as they relate to billing, disconnection/reconnection and disputes and complaints. These protections would be as provided in the National Energy Retail Law in NECF jurisdictions, and in jurisdictional instruments in non NECF states, including provisions relating to wrongful disconnection payments and bans on late payment fees.

SACOSS also considers that the issue of metering contestability for child connection points is also an important consideration which applies to this rule change. SACOSS proposes that the AEMC addresses this issue in its draft determination.

SACOSS is aware that the dynamics between the exempt seller within the embedded network and those authorised retailers may warrant further exploration. Are there particular issues for authorised retailers and their customers associated with the exempt seller also being the owner, operator or controller of a network?

We thank you in advance for your consideration of our comments. If you have any questions relating to the above, please contact SACOSS Senior Policy Officer, Jo De Silva on 8305 4211 or via [jo@sacoss.org.au](mailto:jo@sacoss.org.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'R. Womersley', with a large, sweeping flourish at the end.

Ross Womersley  
Executive Director