

## **DRAFT REPORT: REVIEW OF REGULATORY ARRANGEMENTS FOR EMBEDDED NETWORKS (AEMC No: "RPR0006")**

### **EXECUTIVE SUMMARY**

The Shopping Centre Council of Australia (SCCA) represents Australia's major owners, managers and developers of shopping centres. Our 25 members are listed at the end of this submission.

As shopping centre companies, our members own and operate embedded networks as an incidental activity to their core business – providing energy to a defined set of commercial customers – with an overall relatively small maximum national market of 65,000 tenancies.

We welcome the opportunity to provide a submission on the Australian Energy Market Commission's (AEMC) *Draft Report: Review of Regulatory Arrangements for Embedded Networks (AEMC Project No: RPR0006)*. We also welcome the opportunity to discuss the Draft Report with the AEMC, and attend the AEMC's Stakeholder Workshop.

Our comments and recommendations draw on the AEMC's four *Draft Recommendations* (noted at **Appendix 1**), which have been framed around: (1) improved access to competition in legacy networks, (2) elevating new networks into the national framework, (3) better consumer protection for new and legacy networks, and (4) improve the regulatory framework for gas networks.

We have also responded to the four issues (at page iv.) for which the Commission is interested in receiving stakeholder views. In addition, we have drawn on our previous submission to the AEMC on the Consultation Paper for this review.

### **PRINCIPAL CONCERNS**

As we detail in this submission, our principal concerns with the Draft Report are as follows:

- The AEMC has failed to separate apparent residential network issues (e.g. the 'growth' of residential networks noted at page 17/Figure 3.4), from non-residential networks; thus, resulting in our sector being inadvertently captured in the 'need' for change, and the proposed 'one-size-fits-all' new, and costly regulatory framework.
- In articulating various market and regulatory issues, the AEMC makes a giant leap to requiring authorisation / registration as a solution, rather than seeking to resolve relevant issues under the exemption framework; even where proposed authorisation 'obligations' in effect mirror current exemption 'conditions'.
- The AEMC has not: (1) properly detailed, or analysed the proposed new costs, (2) sufficiently addressed issues relating to the 'entry criteria' (e.g. organisational and technical capacity) for authorisation, despite general claims about the need for 'flexibility', (3) addressed how new costs will be balanced against existing AEMC-led reforms, where costs still remain unknown (e.g. Embedded Network Managers), or (4) addressed issues to avoid regulatory duplication (e.g. dispute resolution).

A situation whereby an embedded network owner would be 'regulated' into operating at a loss is untenable.

### **RECOMMENDATIONS**

We provide the following recommendations for the AEMC's consideration:

- The AEMC should continue the exemption framework for shopping centre embedded networks – 'legacy' and new networks alike – reflecting:
  - (1) that no substantial 'issues' have been raised in relation to our sector,
  - (2) our high 'visibility', and low regulatory risk - including in relation to potential mechanisms to deal with 'third-parties' or 'market intermediaries',
  - (3) our customer base (whereby 'small' customers can be 'large' companies, who also have 10s-100s of energy contracts, and are not 'vulnerable'),
  - (4) the incidental nature of on-selling to the principal relationship with its customers (i.e. retail tenancies), and
  - (5) the well-established regulatory dispute resolution mechanisms.

We believe there is a strong basis for the AEMC to recommend the continuation of the exemption framework for shopping centres, particularly as the exemption framework is proposed to be retained for 'legacy' networks, and existing targeted exemption categories (e.g. R1, R5).

This approach would also enable the prioritisation and allocation of scarce resources to higher-risk networks, operators and customers (e.g. vulnerable customers).

This approach could also facilitate proposed new 'protections', in the form of additional exemption 'conditions', such as reporting to the AER.

Cont:

- Before finalising any new regulatory framework, the AEMC needs to further analyse the embedded network market, including the key differences between residential and non-residential networks, including the characteristics of relevant customers.
- Before finalising any regulatory framework, the AEMC needs to better articulate the actual issues it claims have arisen in the embedded network market, versus theoretical and general principles, and provide more evidence that there is a structural failure to the extent that it warrants the proposed structural reform.
- Before finalising any regulatory framework, the AEMC needs to provide detailed costings for the proposed new approach, including issues such as registration and authorisation costs, market access, new customer protections, obligations and information provision.
- Before finalising any regulatory framework, the AEMC needs to consider the proposed new costs in relation to current reforms, including the *Embedded Network Manager Rule Change* which, despite commencing on 1 December 2017, still presents our sector with uncertainty given no ENMs have been accredited by AEMO.
- The AEMC should better align its proposals with other sector-specific regulation, such as retail tenancy legislation. Rather than the AEMC's proposal for jurisdictional governments to 'consider' disclosure at the time of purchase or lease of a property, the AEMC's efforts would also be better placed realising that this would be duplicative, and should instead seek to avoid potential duplication such as 'forum shopping' in relation to dispute resolution.

#### GENERAL COMMENT

We are deeply disappointed with the AEMC's Draft Report.

In light of the apparent issues raised in relation to residential networks, the AEMC has not assessed embedded networks in our sector in sufficient detail, which has resulted in our sector being inadvertently captured amidst issues that seem evident in other (e.g. residential) sectors, and the associated 'need' for change.

This includes the apparent and "overwhelming" growth of residential networks; as detailed at page 17 and Figure 3.4 of the Draft Report –which does not encompass our sector, either as a non-residential sector, but also as a more 'traditional' embedded network sector, with a vastly different operating approach and customer base.

This lack of appropriate distinction is also illustrated in the 'Findings' at section 5.1.2, whereby several stated findings of the AEMC's research predominantly relate to residential networks, including the AEMC's 'agreement' with 'many submitters' that the "regulatory framework should be changed so it remains fit for purpose in the face of the growth in the number and scope of embedded networks". As noted above, our sector is not part of this 'overwhelming growth' as illustrated at Figure 3.4.

In using the circumstances of residential networks as the foundation, the AEMC has essentially then taken a massive leap to recommend a 'one-size-fits-all' approach of authorisation / registration for all sectors, for new networks.

In doing so, it is abandoning a key benefit of the current exemption framework, which enables a targeted sector-based approach (e.g. R1, R5).

The basis for some the AEMC's claims also still (and we say *still*, because we highlighted such issues in our previous submission) rely on issues raised in other submissions that are based on residential scenarios (e.g. SACOSS).

It is also concerning that the AEMC may not fully understand the shopping centre market when distinctions are drawn. The AEMC's claim (at page 90) in relation to where the 'supply of customers where duration of occupancy is short or temporary' doesn't demonstrate a sound understanding of the shopping centre market. Like other examples, such as hotels, holiday cabins and caravan parks, our sector also has 'short' and 'temporary' occupancy.

This includes short-term leases (commonly referred to as 'pop-up shops') and also 'casual mall licensing'. We recently submitted to the Australian Competition and Consumer Commission (ACCC), for a separate purpose, that our members' average casual mall licenses go for a 12-day period. Such a licence term would be shorter than some caravan park, or even hotel occupancies.

The AEMC may be unaware about this characteristic of our sector, including that short-term occupancy is also a growing feature of our market.

We also believe that the AEMC has overlooked other issues in our sector, including customer characteristics, whereby 'small' energy customers are in fact 'large' companies. Rather than recite these issues in detail here, we encourage the AEMC to re-read our previous submission on the Consultation Paper which provides a detailed outline of relevant issues.

In light of the above, we do not believe that the AEMC can fairly make its key claim (at page iii) that "The Commission does not see retaining the current framework as an option".

We do not believe that the AEMC has fully tested the 'option' of continuing with the exemption framework for shopping centres (legacy and new networks).

The AEMC raises issues about a lack of 'visibility' on certain networks, along with compliance / monitoring / enforcement issues and reporting issues.

However rather than interrogate how these could be addressed under an exemption framework; the AEMC has abandoned this option, and opted to instead to advance to an authorisation/registration based framework.

Enhanced reporting to the AER could, for example, be enabled under the exemption framework.

In proposing an authorisation / registration framework, the AEMC also overlooks, or trivialises, the three entry criteria for retailer authorisation, being: (1) organisational and technical capacity, (2) financial resources, and (3) suitability.

Aside from broad-brush references to the need for the authorisation framework to provide 'additional flexibility', and avoid 'inappropriate obligations', there is no real assessment of why authorisation would be proportionate, or superior – or how issues such as organisational and technical capacity, and financial resources, will be overcome.

Even a large energy company, such as Origin, is cited (at page 93) as providing that:

*Given the high level of regulation associated with energy sellers, this would create an excessive regulatory burden on embedded networks whose sale of energy is genuinely incidental to their primary business.*

Further, given that some of the proposed 'minimum obligations' for authorisation (page 94) in effect reflect existing 'terms and conditions' for exemptions – both of which are applicable under the National Energy Retail Law (NERL) – it has not been sufficiently articulated why, in providing new and additional customer protections such as access to Ombudsman schemes, having such a requirement as an 'authorisation obligation' rather than an 'exemption condition', would be superior on critical criteria, or indeed cost-effective.

In addition, the AEMC's assertions such as those in relation to there being significant barriers to customers accessing competition is simplistic, and seeks to generalise all embedded networks. The claims about customers being supplied by a 'near-monopoly supplier', and customers being subjected to risk of 'excessive prices' are tenuous. Some of our members' centres already have 10-20% of their tenants as 'on-market' customers.

Such claims also ignore, for instance, the AER's current exemption requirement for 'explicit informed consent' for brownfield sites, whereby it is a requirement that customers provide their consent. In such cases, a customer has exercised their right and chosen to provide their informed consent to be part of an exempt embedded network arrangement.

In proposing the new regulatory framework, it is also concerning that the AEMC has abandoned some key points in relation to embedded network operation. This includes the fact that embedded network owners cannot spread additional compliance and operating costs over either a large customer base, or over a growing customer base outside their asset. The AEMC also expressly suggests that authorisation be required irrespective of the 'incidental' nature of on-selling (at page 94). It is a great concern that the AEMC is overlooking these issues.

A further critical concern is that the additional costs associated with the proposed authorisation and registration (including Ombudsman schemes) approach have not been properly detailed, let alone analysed. We explore the issue of additional costs in the section below.

### **NEW COSTS AREN'T DETAILED OR ANALYSED**

None of the AEMC's proposed new, additional costs have been articulated or analysed.

Our disappointment with the Draft Report is particularly prevalent in relation to the new costs associated with the new regulatory framework and higher regulatory burden.

Rather than a detailed assessment of actual costs, and the allocation and distribution of these costs, the Draft Report is instead littered with generalised and unsubstantiated statements and summaries.

Such statements should not be a substitute for rigorous analysis.

This includes statements such as: (1) "costs will be minimised" (page 77); (2) "however, this is a one-off cost which the Commission considers reasonable"; (3) "we do not expect the cost of complying with the rules to be significantly more than the cost of complying with exemption conditions"; and (4) "obligations...which would not be significantly more onerous than those currently included in the exemption conditions".

This also includes the AEMC's claims that *"the proposed changes will involve some costs for parties that supply or sell electricity to embedded network customers. However, costs will be minimised by designing obligations to be proportionate to the issues they are intending to address. Importantly, the benefits of improved consumer protections and access to retail market competition are expected to outweigh these costs"*.

These are truly concerning claims and statements.

Of equal concern is that such general claims in relation to costs are reflected with untested statements that the costs are appropriate due to the proposed 'benefits'.

In relation to the claims made about additional costs, there is not one detail on these costs.

This includes costs in relation to proposed new obligations, such as those articulated at page 77 as follows:

- The embedded network service provider and the authorised retailer to report on compliance to the AER.
- The embedded network service provider to appoint an ENM for all new embedded networks, including in embedded networks with 29 or fewer customers.
- Authorised retailers selling to off-market embedded network customers to appoint a Metering Coordinator to manage metering services and arrange for the installation and maintenance of NEM-compliant metering.

In this regard, what's the basis for removing the current 30-customer threshold to appoint an ENM?

To give the AER credit, with it consulted on its exemption framework to facilitate the appointment of ENMs, it determined that networks with less than 30 customers would not need to due to a potential lack of economies of scale.

We provided specific analysis on this issue, in terms of the coverage of shopping centres.

The AEMC now proposes to remove that threshold with no justification in relation to cost, whereas the AER justified the threshold on the basis that the potential cost could not be sufficiently in networks with less than 30-customer.

How can the AEMC justify this change – in addition to the fact that it is proposing significantly more regulation than what currently applies?

As an engaged stakeholder in embedded network regulation, and as a sector subject to the proposed increased regulatory burden, it is reasonable for us to expect the AEMC to better articulate and assess new and additional costs – and also the impact on customers.

The poor assessment of costs is further reflected in the quotation of 'stakeholder submissions' that seem to uphold the AEMC's prevailing view about the need for regulatory change.

Further, the AEMC's Summary (page i.) highlights the overall simplistic nature of its assessment and basis for its proposed approach. We provide a simple analysis of this statement below (our highlights and emphasis):

*Which customers? There is no analysis of customer-type of their characteristics*

*The Australian Energy Market Commission (AEMC) or Commission finds that the current regulatory framework for embedded networks is no longer fit for purpose and is resulting in some customers not being able to access competitive prices or important customer protections. There is also a Jack of clarity that embedded network owners are meeting their obligations as suppliers of an essential service.*

*Why not seek clarity from owners? There is no regulatory barrier to the AER or AEMO seeking such clarity. Why not include reporting conditions in the exemption framework?*

*Where is the cost analysis of any of the new ENM requirements, obligations and consumer*

*In this draft report, the AEMC is recommending changes to the regulatory framework for embedded networks to address these issues. This proposed framework improves access to competition, better aligns the minimum obligations for supplying embedded network customers with those for supplying standard supply customers and provides embedded network customers with an appropriate set of customer protection.*

*Where have the current customer protections failed?*

### **EMBEDDED NETWORK MANAGERS (ENMs)**

The proposed additional costs also come at a time when the AEMC's current rule change, which will require ENMs to be appointed, still actually hasn't been satisfactorily delivered.

At the time of writing this submission, the AEMO still has not accredited any ENMs, thus highlighting two critical issues (outside from the obviously inability to comply with the AER's requirement to appoint an ENM by 1 December 2017).

Firstly, there is still not an appropriate market of ENMs to enable embedded network owners and operators to tender for, undertake due diligence, and appoint an ENM ahead of 1 December 2017.

Secondly, the cost of an ENM hence remains unknown. Further, the costs 'per se' of an ENM will be addition to, in any case, the costs to an owner to provide the ENM with data and ensure ongoing compliance, and monitor ongoing regulatory risk.

In this regard, the AEMC needs to exercise caution insofar that it is proposing new and additional costs with a proposed new regulatory framework, at a time when a key rule change, due to commence on 1 December 2017, is still not finalised and the industry still doesn't have clarity about the costs (let alone compliance issues).

### **AEMC REQUEST FOR STAKEHOLDER VIEWS:**

In addition to our comments above, we are pleased to respond to the issues raised by the AEMC for stakeholder views.

*The exemption process has flexibility which has been utilised in new, innovative business models. The Commission has proposed moving some of this flexibility to the retailer authorisation process. Will the proposed approach allow an appropriate level of flexibility? What elements should be flexible in the authorisation process?*

As noted above, we do not believe that a compelling case has been presented that the proposed approach will allow flexibility, let alone the cost of this 'flexibility' under an authorisation / registration based regulatory framework.

The AEMC also shouldn't substitute or trivialise the notion of flexibility with the fact that additional costs and obligations are proposed to be placed on embedded network owners.

We support the proposed approach for legacy networks whereby a retailer of an on-market embedded network customer can pay the embedded network owner a network tariff. This will help avoid double-billing issues, and whereby the embedded network owner has no powers to prevent a retailer from issuing such a bill.

*Of the current obligations on authorised retailers under the NERL and NERR, which should be included in the list of minimum obligations that would apply to authorised retailers supplying embedded network customers under the proposed framework?*

While we support the notion of access to Ombudsman schemes in-principle, the AER and relevant Ombudsman should be given the opportunity to complete their investigations before this is finalised as a condition for an exemption, or a standard consumer protection for customers within embedded networks. There are a variety of issues that need to be considered further, and these have not yet been progressed by either the Australia and New Zealand Energy and Water Ombudsman Network (ANZEON), or individual Ombudsman schemes (via legislative or constitutional change), in relation to membership, fees and governance issues.

Similar to our concerns noted above, the cost of Ombudsman schemes for embedded network owners remains known.

We do not support the proposal to improve 'information provision' whereby embedded networks would be required to "publish their prices in line with other authorised retailers".

We support there being flexibility on this issue.

It is important to note that embedded networks – whether authorised or not – are not selling to a broader energy market. They are selling to a defined set of customers within a particulate site or asset. Further, embedded networks generally purchase their own electricity from a traditional authorised retailer. By requiring embedded networks to publish their prices, a traditional authorised retailer could have a distinct advantage in 'gaming' the system.

We would not support the proposal for jurisdictional governments to consider disclosure at the time of purchase or lease of a property. Our sector's relationship with tenants is highly regulated under retail tenancy legislation, and also provisions of the *Competition and Consumer Act 2010*. This expressly includes the requirement for a landlord to provide a 'Disclosure Statement' to prospective tenants. The AER's exemption framework also already includes a requirement an embedded network owner to disclose to, and seek consent from, embedded network customers.

*The Commission has not recommended, at this stage, that consumer benefits be demonstrated to gain approval to establish an embedded network. This is on the basis that the regulatory framework is designed to promote efficient decisions. Do stakeholders agree?*

We generally support this approach.

*Under the proposed framework most new embedded networks involving permanent residential or commercial tenants would require the embedded network service provider to be registered and the on-seller to be an authorised retailer, while exemptions would be available in limited situations such as temporary supply and temporary accommodation. There may also be merit in allowing exemptions for small embedded networks such as caravan parks with a small number of permanent residents. Would a flexible authorisation process be able to have similar benefits and regulatory burdens as the exemption process? What types of embedded networks should continue to be able to obtain exemptions?*

It is our principal recommendation that shopping centre embedded networks – legacy and new – should continue to be able to be exempt.

As we have detailed in this submission, we believe that the above statement highlights that the AEMC has not sufficiently separated residential network issues from non-residential networks; including the 'overwhelming growth' of exemptions articulated at page 17/Figure 3.4.

In any case, the notion of "permanent" tenants in the above statement is false, particularly in relation to commercial tenants.

A key difference between the growth of residential networks, and networks within shopping centres is based around free-hold versus lease-hold property. In certain residential schemes, embedded networks are being sold as part of the sale of a unit, or dwelling, or allotment. In shopping centres, an equivalent 'tenancy' is not actually sold separately; but leased.

Shopping centre tenants have no 'permanency' per se, however they can have security of tenure for the term of their occupancy via state-based lease registration. Shopping centre tenants only have occupancy for the limits of their lease or license agreement, which can be short-term (e.g. 'pop-up' shops, through to five-year terms) through to longer-term for large, national tenants.

Further, shopping centre tenants, where they are 'small' energy customers, can also be: (1) large companies, and (2) hold 10s to 100s of energy contracts across Australia. In some cases, energy procurement by these companies is managed by industry professionals with the benefit of specialised energy and legal advice. This highlights that such shopping centre tenants are neither vulnerable, or in the same position as customers in residential embedded networks.

For the above reason, the AEMC needs to re-consider its fundamental position as to "what types of embedded networks should continue to be able to obtain exemptions".

**APPENDIX 1: AEMC RECOMMENDATIONS****RECOMMENDATION 1. IMPROVING ACCESS TO COMPETITION FOR CUSTOMERS IN LEGACY EMBEDDED NETWORKS:**

- (a) Improve access to competition for legacy embedded network customers by making the process for switching to a market offer as simple as possible. This can be achieved through two main changes:
- Where there is an embedded network manager (ENM) appointed, child embedded network customer connections should be issued with National Metering Identifiers (NMIs), registered by the Australian Energy Market Operator (AEMO) in their market settlement and transfer solution (MSATS) system and discoverable by retailers, regardless of whether the customer is on or off-market.
  - Allowing a retailer of an on-market embedded network customer to pay the exempt embedded network service provider a network tariff that is equal to the standard published LNSP network tariff that would apply if there was no intermediate embedded network.

**RECOMMENDATION 2. ELEVATING NEW EMBEDDED NETWORKS INTO THE NATIONAL FRAMEWORK:**

- (a) Any person who engages in the activity of owning, controlling or operating an embedded network must be registered as a registered embedded network service provider (with a sub-set of the requirements of a network service provider) with AEMO, or exempted by the AER according to a narrow set of circumstances.
- (b) Any party who sells energy to a consumer in an embedded network must hold a retailer authorisation from the AER, or be exempted by the AER from holding a retailer authorisation according to a narrow set of circumstances.
- (c) The Commission also recommends that:
- an embedded network service provider be required to appoint an ENM for all its embedded network connection points
  - the ENM be required to:
    - apply to AEMO for NMIs for all off-market metering installations
    - provide the Metering Coordinator with the NMI for the metering installation
    - register the NMI for off-market metering installations with AEMO (i.e. in MSATS)
    - maintain information in the metering register (i.e. NMI standing data in MSATS) about the metering installations.
- (d) The NER be amended to provide more guidance to the AER on the criteria for network service provider exemptions which would restrict these exemptions to narrow circumstances.
- (e) The AER be provided limited discretion under the authorisations framework to exempt retailers that on-sell electricity in embedded networks from specific conditions under the NERR where the cost of meeting the obligation is disproportionate to the benefit, and does not impede access to retail market competition.
- The AER would not be permitted to exempt authorised retailers from complying with a minimum set of conditions including, for example:
    - providing access to independent dispute resolution through Ombudsman schemes
    - explicit informed consent when entering into a contract
    - life support requirements
    - disconnection requirements.
- (f) Remove the current exempt seller factors from the NERL and replace these with principles that clarify the purpose of retail exemptions are to address circumstances where:
- the costs of retail authorisation, facilitating retail competition and retail churn would outweigh the benefits to customers, and
  - the need for regulatory oversight is low.
- (g) More guidance be provided in the NERR to the AER on the criteria for selling (retail) exemptions.

**RECOMMENDATION 3. BETTER CONSUMER PROTECTIONS FOR NEW AND LEGACY EMBEDDED NETWORKS:**

- (a) The AER, Ombudsmen and jurisdictional governments continue to develop required changes to the retail exemption guidelines and state regulations to increase access to independent dispute resolution services for exempt customers.
- (b) Jurisdictions should consider options for improving awareness of entitlements and concessions and access to these for embedded network customers.
- (c) To facilitate greater transparency of activities within embedded networks related to exempt customers, the NERL should specify a role for the AER to monitor embedded network service provider and exempt selling behaviour. Such a role should include flexibility so that the AER can examine the conduct of particular sellers as required. In the interim the AER should consider how monitoring can be increased under its current functions and powers. The AER should also consider whether the reporting requirements under the exemption framework should be increased.
- (d) Review the penalty amounts for infringement notices and act upon previous COAG Energy Council work in this area.
- (e) Enforcement options for network exemption breaches, including breaches of conditions, should be more closely aligned with the enforcement powers for retail exemption breaches.
- (f) Consider the costs and benefits of extending the requirement on designated retailers (i.e. local area retailer in most circumstances) to provide a standing offer to include embedded network customers, or alternatively whether another party could take on the obligation to offer.
- (g) Make the NERL/NERR work for retail customers in embedded networks, including by addressing the following consumer protections:
  - Consider extending the standing offer price cap for exempt customers to cover retail customers in embedded networks as well. Amend the NERR to align the de-energisation and re-energisation rules for retail customers in embedded networks with standard supply customers.
  - Amend the NERR to align the life support rules for retail customers in embedded networks with standard supply customers.
- (h) Improve information provision by:
  - Amending the NERR to require authorised retailers to provide additional information and obtain explicit informed consent prior to a customer entering an embedded network or other non-traditional selling arrangements. The AER should update the exemption guidelines to reflect that change.
  - Jurisdictional governments should consider whether there is sufficient provision for disclosure of the cost, benefits and risks of embedded networks in state based laws at the time of purchase or lease of a property.
  - Authorised on-selling retailers be required to publish their prices in line with other authorised retailers, though the AER should have some flexibility to exempt some parties from inappropriate obligations.
  - Many exempt sellers should also be required to publish price information to allow customers considering moving into an embedded network an informed choice and to allow greater monitoring of exempt selling activity. The AER should consider whether some embedded networks should be exempt from this requirement due to their size or nature.

**RECOMMENDATION 4. IMPROVE REGULATORY FRAMEWORK FOR GAS EMBEDDED NETWORKS:**

- (a) We recommend the COAG Energy Council:
  - agrees to establish a clear and jurisdictionally harmonised regulatory framework for gas embedded network operators which is consistent with the regulatory framework for embedded network service providers in the national electricity market
  - decides whether to establish this framework through jurisdictional legislation or under the national gas law and rules
  - if this framework is to be established under the national gas law and rules, requests the AEMC to provide advice on changes to the law and rules that would be required to implement it.



**ABOUT US**

The SCCA represents Australia’s major shopping centre owners, managers and developers. Our members are as follows:



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