



Workshop summary

Review of regulatory arrangements for embedded networks Consumer representative workshop

3:00pm-5.00pm, 15 May 2017

Australian Energy Market Commission (AEMC), L6 201 Elizabeth St, Sydney

Attendees

Name	Organisation
Richard Owens	AEMC
Owen Pascoe	AEMC
Kate Reid	AEMC
Greg Williams	AEMC
Dean Lombard	Alternative Technology Association
Sarah Proudfoot	Australian Energy Regulator (AER) (observer)
Simon Kidd	Consumer Action Law Centre
Sarah Davidson	Council on the Ageing
Ken Parker	Council on the Ageing
Rory Campbell	Energy and Water Ombudsman NSW
Helen Ford	Energy and Water Ombudsman NSW
David Havyatt	Energy Consumers Australia
Tim Harrison	Public Interest Advocacy Centre
Jennifer Brownie	Queensland Electricity Users Network
Angus Nardi	Shopping Centre Council of Australia
Kristin Pryce	Shopping Centre Council of Australia
Jo de Silva	South Australian Council of Social Service
Bev Hughson	South Australian Council of Social Service (Darach Energy Consulting Services)
Cynthia Townley	Tasmanian Council of Social Service

Summary

- The AEMC presented a summary of the consultation paper, which was published on 11 April 2017 and posed the questions in that paper to the attendees for discussion.
- Consumer group representatives expressed concerns regarding:
 - vulnerable consumers in embedded networks, including caravan parks
 - limits on the AER's ability to monitor and enforce exempt selling and network service provider conditions
 - access to independent dispute resolution for embedded network customers
 - consumer protections for embedded network customers, including hardship programs
 - lack of national consistency in regulation of embedded networks
 - tenants in embedded networks possibly being charged higher prices, while the landlord may get benefits through an owner's corporation or strata body
 - difficulty for some embedded network customers to raise a dispute with the embedded network owner as they may perceive a risk of a difficult relationship or eviction

- conversion of existing sites to embedded networks and the role of explicit informed consent.
- Some benefits of embedded networks were also noted, including:
 - price benefits, though it was noted that it is not clear if these will be maintained over time
 - access to alternative energy sources.
- Attendees noted embedded networks with distributed energy resources (e.g. solar and batteries) have different issues.
- Attendees discussed the differences between embedded networks and microgrids, with reference to the *Alternatives to grid-supplied network services* rule change request submitted by Western Power.
- There was general agreement amongst consumer representatives that consumers need similar protections regardless of the form of supply, and that there was a need to re-consider consumer protections for all consumers.
- Some consumer representatives thought the AEMC should consider either improving the current framework or replacing the framework. Some thought the existing framework was not sustainable in the longer term.
- Some consumer representatives thought an authorisation approach would be more suitable than an exemptions approach in some circumstances.
- Some consumer representatives thought there was a need to make the conditions on embedded network owners and consumer protections better known in order for consumers to feel confident in asking for them.

Note that following the workshop submissions were received from the following attending organisations, and these are available on the AEMC website:

- Alternative Technology Association
 - Energy and Water Ombudsman NSW
 - Energy Consumers Australia
 - Public Interest Advocacy Centre
 - Shopping Centre Council of Australia
 - South Australia Council of Social Service, St Vincent de Paul Society Victoria, Ethnic Communities Council of NSW and Consumer Action Law Centre
 - Australian Energy Regulator.
-