

From: [REDACTED]
To: [EPWA - Submissions](#); [REDACTED]
Subject: Voluntary Embedded Networks Code of Practice
Date: Tuesday, 20 June 2023 2:45:11 PM

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Hi

I want to make a couple of comments on the above code of practice, but I don't have the time to go through all the detail in all the documents or to organise it to fit your formal feedback form. So apologies if I've misunderstood things or if it's not in your preferred format.

1. I am on the CoO of a Strata Co with 26 apartments. We own our embedded electricity network, we buy energy from Synergy and we invoice owners for their consumption. So as I understand it our strata co would be the ENS.
2. No-one has contacted us formally, either directly or via our strata manager, to make us aware of this code of practice. I am not sure how I found out about it, but it wasn't through any formal notification from government or anyone else. I find it appalling that new laws and codes are being introduced and owners of strata companies are not formally notified!
3. My main concerns about the code are:
 - a. It imposes a raft of new admin and legal requirements on Strata Companies, which are all run by unpaid volunteers (with extremely poor support from Strata Managers). Strata Co's as ENS would have to enter into supply arrangement contracts with every owner. This could be hundreds of people so someone has to develop and manage hundreds of disclosure statements, write all kinds of complaint, complaint resolution and hardship policy documents, be forced to respond to frivolous questions and complaints. This is a totally unnecessary burden to put on Strata Companies – we can and have managed without this burden up to now so why do we need it? Existing by-laws cover arrangements for collection of electricity fees perfectly adequately.
 - b. The code introduces hardship and family violence requirements on Strata Companies. I fear that what this amounts to is the government making Strata companies subsidise people with these issues. This is totally unfair – if one owner has these difficulties and can't or won't pay their bills, the other owners are going to have to subsidise them because the Strata Co will have to keep paying irrespective. Ultimately the increased costs might even drive others into hardship – a domino effect. The Strata Co can't even require any proof that the claims of hardship are genuine! That is totally unfair and in my view completely unnecessary.
 - c. There are plenty of existing laws outside of strata to protect people – there is no need to introduce another raft of onerous laws and admin requirements within strata.

Regards

[REDACTED]
[REDACTED]