

## Draft Voluntary Embedded Networks Code of Practice

### Consultation paper submission form

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Submissions should be emailed to [EPWA-Submissions@dmirs.wa.gov.au](mailto:EPWA-Submissions@dmirs.wa.gov.au) or posted to Energy Policy WA, Locked Bag 11, Cloisters Square, WA 6850 by 5pm (AWST) 23 June 2023.

Please indicate on the covering page of your submission if you wish part or all of your submission to be treated as confidential. Unless otherwise requested, submissions will be made available on the Energy Policy WA website.

Question number	Consultation area and section reference in Consultation Paper	Questions for consultation	Your comments
1.	<b>Embedded networks business models</b> (section 3)	Are you aware of any significantly different business models to those described in this Consultation Paper used in embedded networks in Western Australia?	
2.	<b>Embedded network seller definition</b> (section 4)	Do you have any suggested changes to the proposed 'embedded network seller' definition?	Not sure who is the seller when a strata company onbills directly through its strata manager. This requires clarification.
3.	<b>Embedded network seller obligations</b> (section 5.1)	Do you have any comments on the general obligations on embedded networks sellers proposed in clauses 1, 2 and 3 of the Voluntary EN Code?	Are strata managers expected to be network sellers?
4.	<b>Draft Disclosure Statement</b> (section 5.2)	Does the draft Disclosure Statement capture all information that should be disclosed to customers upfront? If not, what other information should be included?	
5.	<b>Metering arrangements</b> (section 5.3)	Do you have any comments on the proposed arrangements for metering outlined in clause 5 of the Voluntary EN Code?	Strata managers often issue invoices for their clients. Who is the
6.	<b>Disconnections and interruptions standards</b> (section 5.8)	Do you have any comments on the standards for disconnections and interruptions proposed in clause 10 of the Voluntary EN Code?	These are fine.
7.	<b>Access to renewable sources of electricity</b> (section 5.11)	Are the requirements in clause 14 of the Voluntary EN Code sufficient to facilitate access to electricity from renewable sources? Is anything else required, for instance additional information provision?	No. Strata companies find it difficult to merge meters for the purposes on installing solar.

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8.	<b>Metering functionality</b> (section 6.1.1)	8.1 Should private meters installed in new embedded networks be subject to minimum standards in terms of functionality? For instance: <ul style="list-style-type: none"> <li>meter captures and stores data in 30 minute intervals;</li> <li>meter captures and stores data in 5 minute intervals; or</li> <li>meter supports remote reading (communications enabled).</li> </ul>	Yes (all of the items listed should be accessible by the network owner (strata company in my circumstances))
		8.2 Should metering standards only be applied to new builds, or also to meter replacements and upgrades in existing embedded networks?	Yes.
		8.3 Should such requirements also apply to conversions to embedded network (known as meter merges)?	Yes however it is imperative that Synergy is removed from consent applications. We have nearly 4 years of attempting a meter merge blocked by Synergy account holders misled by CVF forms provided by Synergy.
		8.4 What exemptions might be required if metering standards are applied?	Strata company must be able to onbill directly to residents as per current exemptions without being registered.
9.	<b>Meter ownership and access</b> (section 6.1.2)	9.1 Should there be a requirement that, from a certain date, private meters installed in embedded networks must be owned outright by the property owner (or collective property owners if strata titled)?	Yes. Synergy does not make it easy (in fact it's nearly impossible to upgrade to embedded networks for the purposes of solar installations) as they require 100% of account holders to sign Verifiable Consent Forms (VCF). I find their VCF forms misleading and deceptive.

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		9.2 Should there be a requirement that, from a certain date, private meters installed in embedded networks must meet certain requirements for access, interoperability and/or common communication standards?	No. I do not believe there is a need for private metering on embedded networks as solar installations are across the network
		9.3 Should any other types of assets in the embedded networks (e.g. DER assets) be covered by similar ownership and access requirements or is it acceptable for ownership of these other types of assets to be outsourced to reduce upfront costs to customers?	Yes
10.	<b>Regulation of safety requirements in embedded networks</b> (section 6.2)	Do you consider there is a need for greater regulation of safety requirements within embedded networks? Why/why not?	Yes. Synergy makes it impossible for strata companies to upgrade to embedded networks with their current misleading VCF that scares residents in strata companies.