

Draft Voluntary Embedded Networks Code of Practice

Consultation paper submission form

Full name	Lee de Castro
Organisation and job title	ESM Strata – Strata Community Manager & Sustainability & Energy Advisor
Postal Address	15/443 Albany Hwy Victoria Park
Email Address	sustainability@esmstrata.com.au
Phone Number	

Submissions should be emailed to 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.	Embedded networks business models (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?	No, this adequately covers the models in Strata companies.
2.	Embedded network seller definition (section 4)	Do you have any suggested changes to the proposed 'embedded network seller' definition?	<p><i>that is operated by or under the control of a person (one person) – that is, is subject to a single controlling mind.</i></p> <p>This is an impossible definition for a strata company. The strata titles act requires a minimum of three owners to form a council of the strata company and this is who makes the decisions for the strata company. Never a single person.</p> <p>Also it should be considered that the council members change annually and there should be no restriction to the strata company to require an owner to remain as a council member or decision maker. This needs to be allowed for in the definition. Allowing any member of the strata company council to sign documents with the consent of the council members.</p>
3.	Embedded network seller obligations (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?	<p>It is a desirable outcome to have a standard supply agreement provided to all strata owners and it would be the responsibility of the property manager/owner to pass onto the tenant with a new lease.</p> <p>To require this to be signed in a formal contract by both parties is not required. It will cause unreasonable administration costs and cannot be effectively managed by the ENC. Having this requirement will encourage disputes, and if a resident refuses to agree to the terms, they can't opt out of the embedded network.</p>
4.	Draft Disclosure Statement (section 5.2)	Does the draft Disclosure Statement capture all	Yes, I feel the main concerns are met here.

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		information that should be disclosed to customers upfront? If not, what other information should be included?	
5.	Metering arrangements (section 5.3)	Do you have any comments on the proposed arrangements for metering outlined in clause 5 of the Voluntary EN Code?	<p>5.2 requires professional advice, this is not something many ENS will be able to give accurate information on. It seems that if any residents enquirers about meters , the ENS needs to outlay costs to have the answer provided and is not able to recover these costs, particularly if the resident is not committed to having any further action.</p> <p>It would be more helpful if an information document was made available of the most common and relevant meters and their use, which both the ENS and the customers can access to determine if there is a need for the matter to be escalated and have the arrangement broadened in 5.4 to accommodate this.</p>
6.	Disconnections and interruptions standards (section 5.8)	Do you have any comments on the standards for disconnections and interruptions proposed in clause 10 of the Voluntary EN Code?	Nil

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7.	Access to renewable sources of electricity (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?	<p>This seems limited. It would be ideal to have an additional section that allows for alternatives to be considered here. Particularly since renewable technology is fast evolving and off sets may become outdated.</p> <p>It is good to have the offsets as a section, but to have a process allowing alternative energy and maybe a pathway for the customers to have proposals put forward for discussion. Such as an ability for customers of embedded networks, including tenants to demand a motion be put forward at an AGM to consider renewable investment to be made at the property.</p>
8.	Metering functionality (section 6.1.1)	<p>8.1 Should private meters installed in new embedded networks be subject to minimum standards in terms of functionality? For instance:</p> <ul style="list-style-type: none"> • meter captures and stores data in 30 minute intervals; • meter captures and stores data in 5 minute intervals; or • meter supports remote reading (communications enabled). <p>8.2 Should metering standards only be applied to new builds, or also to meter replacements and</p>	<p>No, there are too many variable situations, these standards may not be of benefit to customers and require additional expense for no benefit.</p> <p>The market will naturally have these standards implemented over time as the availability of these is affordable and naturally becomes all that is produced.</p> <p>If there are standards, it should be required on new builds because the unit owners and customers don't get a say in the developer's decisions.</p>

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		upgrades in existing embedded networks?	<p>However, in upgrades it should be may available to the ENS that there are different meters available, and the choice is made consciously and fully informed.</p> <p>For replacements there should be no requirement, there is no benefit in having one smart meter when the rest are not.</p>
		8.3 Should such requirements also apply to conversions to embedded network (known as meter merges)?	ENC or meter merges should be required to have the owners made aware that there are different meters available prior to the installation, and the choice is made consciously and fully informed in a majority vote if the meter is not up to the same standard that would be installed in a new small account.
		8.4 What exemptions might be required if metering standards are applied?	The minimum requirement should not differ from what synergy has in use in small account meters for residential ENS.
9.	Meter ownership and access (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, In these arrangements, generally, the property owner/Strata company pays for the cost of the infrastructure including the meters. It should become and remain the part of the property at the end of the initial term of the agreement.
		9.2 Should there be a requirement that, from a certain date, private meters installed in embedded networks must meet certain requirements for access,	<p>It would be reasonable that once the mandatory standards are in place there is a date set for a minimum requirement for the meters to meet.</p> <p>This should not be a higher expectation than what Synergy must meet.</p>

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		interoperability and/or common communication standards?	This should be left as it is to encourage the uptake of renewable infrastructure.
		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?	
10.	Regulation of safety requirements in embedded networks (section 6.2)	Do you consider there is a need for greater regulation of safety requirements within embedded networks? Why/why not?	I am unaware of a situation where the safety requirements of the property would differ from an embedded network compared to the multi-meter property.