

23 June 2023

Energy Policy WA
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Perth WA 6000

Email: EPWA-Submissions@dmirs.wa.gov.au

RE: Voluntary Code – Embedded Network Services in Western Australia Consultation

SCA (WA) is pleased to have the opportunity to comment on the consultation draft *Voluntary Embedded Networks Code of Practice*.

SCA (WA), as the peak industry body for strata and community title management, is an advocate for increased consumer protections for all energy consumers in Western Australia. SCA (WA) believes lot owners, strata company's and residents currently using embedded networks should be afforded the same choices, consumer rights and protections as those using non-embedded energy supply networks.

As such, we acknowledge the requirement for a code and the need for improved customer protections for EN consumers in WA, and we agree that if implemented correctly, a voluntary code will improve these outcomes for all consumers in strata-titled communities in WA.

This will be a step towards a lower potential for unfair contracts and pricing, being locked into agreements, not being afforded similar protections as some retail customers and other negative consumer outcomes.

At the same time as offering these improvements, SCA (WA) wishes to ensure that the implementation of a future code runs smoothly, and doesn't produce barriers and issues from its own for strata consumers.

SCA (WA) proposes that there is a high degree of industry consultation between this draft code feedback period closing, and any steps and outlines towards implementation, consisting of roundtables or workshops that include SCA (WA) and other industry and consumer participants to ensure all angles regarding workability and practicality are explored.

These workshops could explore in greater detail:

- ENS and customer obligations, and what that might look like in practice (case studies and industry expertise).
- Tariff options under the voluntary code and correct application of charges
- Metering requirements and technical aspects of existing embedded networks
- Disclosure and informational requirements
- Dispute resolution options

SCA (WA) looks forward to your response and to further engagement on this critical matter.

Kerrin Simmonds
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