

From: [REDACTED]
Sent: Wednesday, 27 March 2024 5:45 PM
To: EPWA Alternative Electricity Services
Subject: Submission-Regulation of Embedded Networks

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Hello,

I wish to make an anonymous submission to this enquiry in the form of a narrative rather than use the standard format.

What follows is a exact reason that Embedded Networks need to be fully regulated, and their customers be able to utilize the services of the Energy & Water Ombudsman.

Background

My wife & I have lived in what is now called the [REDACTED] Lifestyle Village [REDACTED]. The village now contains 105 homes occupied by about 150 residents, mostly elderly, and many age pensioners. The village has operated as an Embedded Network since we moved here (at least.) We were originally charged "full" commercial tariff for our electricity. This changed about late 2014 when the rate dropped from 20c per Kwh to 14c per Kwh. From memory this was because WA Treasury issued a regulation "On-supplying of electricity." This regulation stated that we, as customers of an "Embedded Network", could be charged no more for electricity or supply charge than we would be charged if we were customers of (I think then) Western power. We were charged the supply charge as "additional homes."

We installed a 1.5Kwh solar panel system in early [REDACTED] and retained our existing meter – which simply "ran backwards" if our solar output exceed our usage. The (then) owners accepted this arrangement on the basis that our meter always showed the exact amount of power we had draw from the village's embedded network. The owners only allowed 15 homes to have solar, and limited them to 2Kwh size. A number of these homes changed their meters, at the insistence of the solar installers – who insisted this was a Western Power regulation. So the village ended up with a variety of types of meters.

History of problems

On 14/01/2020 residents of the village received notice that the village that the village had been sold to [REDACTED] and that our Site Agreements had been assigned and that effectively "nothing would change." At this time there were only the original 15 homes with solar, but after several months the new owners [REDACTED] allowed a number of other homes to install solar – with a size limit of 2.5Kwh. In total about another 20 systems were installed.

[REDACTED] has had many changes of Village managers in the last 4 years (from recollection, 4 "sets" of husband & wife teams and 3 sole managers.)

1. Meters

Problems started when some of these managers could not even read a simple meter – like mine. It had a 5 digit readout but the manager/s insisted on only reading 4 numbers. Unbelievably they would read the first 4 numbers – not the last 4 (e.g. my meter showed 84123 & the manager/staff would record it as 8412!). No wonder they could not understand any of the new type of meters.

[REDACTED] head office were advised of this and their ultimate decision was to stop charging any of the 105 homes for electricity for several months.

During this time there were rumours that [REDACTED] intended to install new meters to all the homes in the village. In March 2023 [REDACTED] appointed a new Regional Manager for WA [REDACTED] had no previous experience with either park home villages or Embedded Networks.

One of [REDACTED] first task was to arrange the installation of the new meters. Residents were curious why new meters were needed, with solar homes particularly concerned.

At the first meeting [REDACTED] held with the solar panel home owners he did not really inform us why the meters need to be changed.

Then later [REDACTED] told us it was due to Western Power regulations, which he had printed off & highlighted various sections. It was obvious both [REDACTED] [REDACTED] did not realize that Western Power regulations did not apply within an Embedded Network.

The owner/operator of an Embedded Network could change meters as often as they liked (at their expense.)

We were finally informed that [REDACTED] were concerned about the amount of power being exported to the village's Embedded Network from the homes with solar. The new meters would allow this to be read.

Residents with solar naturally asked how much [REDACTED] would pay for this exported power. [REDACTED] firstly indicated "nothing" – then came back later with 7cents per Kwh – then eventually to the same rate as we would be charged for power we used (30.18cents per Kwh) – bearing in mind the power we generated saved [REDACTED] buying power from Synergy at a rate of about 43cent per Kwh.

Finally – we were back to where we were (financially) after many weeks of unnecessary worry and stress caused to many residents.

2. Supply Charge

[REDACTED] is back at it again! Re-interpreting, or simply ignoring, the regulations (now issued by Energy Policy WA) On-selling of electricity.

[REDACTED] has located a copy of Synergy's tariff schedule which shows a definition of "added homes" as being "properties that contain multiple residential premises where a *Western Power* submeter is supplied through a main meter."

[REDACTED] is adamant that therefore residents homes in an Embedded Network are not "additional homes" as we don't have "Western Power" meters and are liable for the supply charge tariff of \$1.1046 per day rather than the "additional homes" tariff of 43.9179 cents per day.

This obviously completely ignores the very purpose of the regulations set out in "On-selling of electricity."

A number of residents have already lodged complaints with Consumer Protection, and more are in the process.

Conclusion

Embedded Networks need definitive regulations to prevent the above situations occurring – where managers with little to no experience or understanding of simple regulations can cause undue stress and anxiety – especially to elderly people.

Regards

[REDACTED]