

**From:** Rose Ferrell  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Comment on Embedded Network consultation / regulation; Western Power's approach to Embedded Networks  
**Date:** Tuesday, 30 April 2024 4:47:35 PM

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Dear Sarah, Madelin, (Jai),

Thank you for taking this information on board, and for assisting where possible with the project to create an embedded network for the Pemberton Aged Accommodation Inc / Pemberton Retirement Village.

Hi, this is Rose Ferrell, also convenor of CREATE Community Energy (CRE) and Clever CLOGS Pemberton.

We have had some correspondence previously as I have been working on community renewable energy in WA, and more recently on seeking to create an embedded network for the Pemberton Retirement Village.

I have also noted the recent consultation on embedded network regulation which has been a priority for Energy Policy WA.

I originally put my name down to be involved in the consultation on proposed regulation of ENs in WA. The webinars I viewed quickly seemed irrelevant to me, and I thought these comments may be taken on board with regard to this.:

#### **Comment on Embedded Network discussion**

My observation of the discussion / intention of the proposal to regulate ENs in WA is that it is based on the presumption of a naïve consumer who needs to be protected from unscrupulous EN managers. This is not incorrect, but not always the case.

There needs to be another level of regulation (or 'enablement') which is based on the presumption of equals, and where the power balance is less extreme, where both parties are working together. For example, the case of the Pemberton Aged Accommodation Inc in seeking to establish a power-sharing arrangement amongst residents of a retirement village. We are not being 'exploited' by the management committee. Neither is the management committee representing a for-profit business. We just want to generate our own power and share the cost of power generated equitably. The case of PAA Inc represents a community who seek to provide social housing to its ageing community. In this case, regulation, the need for licences etc, are onerous and unnecessary requirements which make the goal even more difficult to achieve.

Another case in point may be in Community Renewable Energy cooperatives, which seek to deliver power to their communities at reasonable rates. There is clearly a need to consider other scenarios as you consider regulation of the sector.

Regulation and legislation must ideally protect not-for-profit sectors, and allow them to grow and flourish, for the sake of our future. Social housing for low income Australians, including social housing which uses renewables to lessen the cost of living burden on low income householders is an urgent need at present.

I would also like to offer further comment on the unworkability of the system with regard to Western Power's role in our community's ambition to become an embedded network for the purposes of sharing power.:

#### **Comment on Impossibility of receiving a Timely Quote on creating an Embedded Network**

We have been working for over a year with three different companies in order to have a system designed and quoted on which will allow our retirement village residents to share power. One of the primary difficulties and obstacles to achieving our aim is that it is not easy for engineering companies to give us a quote on what it

might cost to become an embedded network. There is no certainty for them in quoting even in principle, because they need to apply first to Western Power to receive approval to create an embedded network (with no certainty of receiving approval). Beyond that, the cost Western Power may charge for its part of the groundworks is an added amount which installers and engineering companies fear will mean the customer will walk away. They have no incentive to promote the idea of an embedded network to developments such as ours, no matter how appropriate it is for such developments to become embedded networks.

This situation is unworkable in a world in which we need to move with utmost speed to renewables and the energy-sharing which is possible through new technologies.

I hope you will take these comments on board and share them as appropriate with your colleagues when such issues are discussed. It is vitally important that Energy Policy WA regulates for the sake of normal consumers as is its brief.

My final comment is a plea. Is there a way in which I can receive an indication from Western Power on what it might cost for the Pemberton Retirement Village to undergo the works necessary (undertaken by a registered installer) in order to become an embedded network in the near future? If we could get an early pricing, without needing to apply and commit money, we could at least know whether it would be sensible for us to continue to push for becoming an embedded network, rather than wasting resources by spending time and money soliciting quotes which cannot be forthcoming because of unknowables such as Western Power costs and approvals systems?

Thank you very much for your help and advice.

Warm regards,  
Rose

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Western Australian Academy of Performing Arts  
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Rose's latest dramatic work is a stage musical  
(Musical score by Jacqueline Verhaar)

*Author of: "The Application of the 'Eternal Dance' Methodology in the Development of an Original Screenplay"*  
(2021) in Batty and Taylor (eds.)  
*The Palgrave Handbook of Script Development*

Look out for *Women who Write our Worlds: Shaping Global Screen Culture*, Intellect Publishers  
**COMING SOON!**