# Consultation on the regulation of embedded networks

# Submission form

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| Full name |  |
| Organisation and job title |  |
| Postal Address |  |
| Email Address |  |
| Phone Number |  |

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| Send your feedback to [EPWA-AES@dmirs.wa.gov.au](mailto:EPWA-AES@dmirs.wa.gov.au) or to Energy Policy WA, Locked Bag 11, Cloisters Square, WA 6850 by 5pm (AWST), Friday 19 April.  We will publish your submission on Energy Policy WA website, unless you ask that we keep it confidential. Please give reasons why your submission should not be published. |

| Question number | Section reference in Consultation Paper | Questions for consultation | Your comments |
| --- | --- | --- | --- |
|  | Section 5.1. Option 1: Status quo – class-based exemption | What costs and benefits have you experienced under the status quo arrangements for ENS being exempt from needing to hold a licence? |  |
|  | Section 5.2. Option 2: Individual exemptions | What minimum conditions would need to be imposed as part of individual exemptions for ENS? |  |
|  | Do you agree that a lack of access to the Energy Ombudsman and means of enforcing exemption conditions are significant problems? Are there any other concerns with licence exemptions additional to those identified in Section 3 – Problem Statement? *(relevant to Options 1 and 2)* |  |
|  | If an exempt ENS fails to meet exemption conditions they are no longer legally able to supply electricity until the issue is remedied. What consequences could arise from this? *(relevant to Options 1 and 2)* |  |
|  | Section 5.3. Option 3: Licensing | Is licensing a suitable option to address some of the issues raised in Section 3 – Problem statement? |  |
|  | Are the costs of licensing ENS proportional to the benefits? |  |
|  | Section 5.4.1. Proposed obligations under the AES Code | Is the AES registration framework a suitable option to address some of the issues raised in Section 3 – Problem statement? |  |
|  | Are the costs of requiring ENS to register under the AES registration framework proportional to the benefits? |  |
|  | Section 5.4.2. Policy questions under the AES registration framework – Protections for large use customers | Do you agree that ENS should be required to facilitate large use customers obtaining a separate master meter at the customer’s cost? |  |
|  | If you are a large use customer, what is your experience in being sold or supplied electricity in an embedded network? |  |
|  | What, if any, other obligations should ENS have in respect of large use customers? Why? |  |
|  | Section 5.4.2. Policy questions under the AES registration framework – Fast track application | Do you support use of the ‘fast track’ route to assess ENS registration applications? Why/why not? |  |
|  | Section 5.4.2. Policy questions under the AES registration framework – Information requirements for registration | What minimum information should ENS be required to supply under an AES registration application process? |  |
|  | Section 5.4.2. Policy questions under the AES registration framework – Requirement for retail licensees to register | Should licensed electricity retailers be permitted to operate embedded networks under authorisation of their licences (with additional licence conditions), or should they be required to also hold an AES registration as an ENS? Please provide justification for your position. |  |
|  | Section 5.4.2. Policy questions under the AES registration framework – Transitional arrangements | What circumstances should be considered for transitional arrangements? What types of obligations on ENS should be subject to transitional arrangements? |  |
|  | Are there any types of ENS that require special consideration or additional time where a phased approach might be appropriate? Why is this the case and how long should such a phased approach take? |  |
|  | Section 7. Implementation | What is the best means of accessing all relevant audiences for ENS educational materials? |  |
|  | What materials and resources would be most suitable to help both ENS and their customers to transition to the AES registration framework? |  |