Submission on the review of maximum prices for embedded networks

To the Commission,

I would like to thank the Commission for this review and work towards delivering fairer prices for consumers in Victoria. I am a consumer who has only recently become aware of the existence and role of embedded networks in the process of moving into a residential apartment complex.

I fully support the draft decision of the Commission; at a minimum, consumers on embedded networks should be afforded the same consumer and price protections as on-market customers.

In addition, the provision of information to consumers within embedded networks is vital to achieving fairer pricing and awareness of consumer rights. Whilst there is generally a wealth of information available to consumers in the national energy market, it appears to me that embedded networks and the companies who operate in this space are not in the general public consciousness. I am still unclear in my understanding for example as to the role of bodycorporates or landlords within this framework and which party controls access to meters.

Logic suggests that exempt sellers should be able to obtain a discounted 'gate' price and these companies certainly tout their ability to pass on savings to consumers within embedded networks. It isn't clear to me however that this is occurring as can be seen by a quick price search within onmarket retailers.

Whilst maximum pricing is the focus and remit of this review, I would like to voice my support for regulatory change to enable access to meters within embedded networks. Price regulations can only go so far and may require administrative burden to enforce and review. Enforcing access to meters by competing retailers is the only effective long-term solution that will break the effective monopoly and bring true market competition for consumers within embedded networks.

While the draft decision includes requirements to provide information to consumers that demonstrates compliance with maximum pricing, a requirement to provide consumers with greater information around the structure of embedded networks and rights of consumers within them may also be useful. I understand however this may be outside the Commission's remit.

Thank you for your time and consideration of this submission.

Dominic Hutching