

ENERGY AND WATER OMBUDSMAN VICTORIA (EWOV): APPLICATION TO PROVIDE A DISPUTE RESOLUTION SERVICE FOR NON-LICENSED ELECTRICITY PROVIDERS

1. ABOUT US

The Shopping Centre Council of Australia (**SCCA**) is the national industry group for major owners, managers and developers of shopping centres. Our members own and operate embedded networks, as an ancillary aspect of their shopping centre operations.

2. COMMENT

We were involved in the Department of Environment, Land, Water and Planning's (DELWP's) consultation on the General Exemption Order (GEO), which was released on 15 November 2017.

In this regard, we are aware of the obligation, due to commence on 1 July 2018, for an exempt person to 'enter into a customer dispute resolution scheme approved by the Essential Services Commission (ESC)', as a condition of exemption under section 11 of the GEO.

We have been in discussion with EWOV in relation to the transition to these new arrangements, including participation in the *Funding Model Review* undertaken by KPMG.

This has also included a briefing on EWOV's proposed approach to issues such as membership, fees, and also the noted *Constitution* and *Charter* reviews.

We are grateful for EWOV's engagement with us.

We have also indicated to EWOV that we are happy to be part of their proposed Embedded Network Working Group, and assist them in ensuring appropriate awareness and understanding of the new arrangements across our industry.

With regard to the issues that the ESC needs to take into consideration under section 28 of the *Electricity Industry Act 2000*, based on the information provided to us by EWOV to date, and the information noted in their application, we have no major areas of concern.

Under section 28 of the Act, this includes issues in relation to the accessibility to the scheme, cost barriers and the scheme's independence.

We have also been discussion other practical scheme issues with EWOV, to enable a better understanding of the embedded network market and issues in shopping centres.

Given the proposed new arrangements, as we have raised in other forums, we believe there is a need for non-licensed electricity providers to be able to fairly gain representation on the EWOV Limited Board – in addition to current electricity, gas and water members. Based on the 'ancillary' and 'incidental' nature of embedded networks (and hence them being treated as exempt providers), their customer base is relatively small when compared to those of existing members. This is an issue that we will monitor over time.

In light of the above, we support EWOV's application to the ESC to vary its existing dispute resolution role to include relevant non-licensed electricity providers, under the GEO.

3. CONTACT

Please do not hesitate to contact me to discuss this submission.

Angus Nardi, Executive Director

