



SUBMISSION FROM THE VICTORIAN CARAVAN PARKS ASSOCIATION - DRAFT
DECISION – REGISTER OF NON-LICENSED ELECTRICITY PROVIDERS: REGISTRATION GUIDELINE

The Victorian Caravan Parks Association thanks the Essential Services Commission for the opportunity to comment on the proposed additional information that will be required from non-licensed providers in the process of registering for exemption from licensing.

Feedback is offered on the following questions:

1. *Is the additional information we are proposing to request **and** publish (1.1 to 1.5) appropriate as identifiers that make it easier for customers to better search the public register to find their electricity provider? Please explain why or why not.*

In general, we find this additional information appropriate and easy to supply.

1.2 However, we question the need for 1.2 – the provider’s trading name. Since the name of the provider has already been required in the list of minimum information under legislation, there should not be a need for additional information about the business owners of the caravan park. That is personal business information and should not be a requirement.

2. *Is the additional information we are proposing to request **but not** publish (2.1 to 2.4), appropriate to help us and customers better understand the nature and scale of these segments of the electricity market and effectively regulate these sections of the market?*

2.1 We are unsure as to the purpose of the requirement to provide information as to whether the sites in the park are individually metered. Parks that are individually metered may only charge the site holders in accordance set out annually by the Essential Services Commission. Site rents for occupancy of the site are set in isolation of the utilities charges, and are generally set to align with the federal rental rebate allowances to low-income earners.

Parks without separate site meters set their site rental amounts to include an averaged cost of electricity usage by park occupants

In the absence of an understanding of the purpose behind this proposed requirement, further information is required before we can make a decision on this proposed requirement

2.2 As above – we do not see the need for 2.2 - the network owner's contact details if different to the operator - as this is personal business information and should not be a requirement.

3. Is there additional information that should be captured to improve customers' ability to search the register or provide the commission with a better understanding of these segments of the electricity market?

No. We believe that the information requested is more than sufficient to provide consumers and the Commission with a better understanding of the Market and its contact points.

4. Is this draft decision on the guideline useful for non-licensed electricity providers that are required to register with the commission, to understand the information requirements and process for registration?

Yes, this information is helpful. Small business owners, who form the majority of VicParks' membership, have little time and inclination to read wordy tomes or to struggle through technical information. Simple and clear-cut information on the requirements and the way to achieve compliance with these is very helpful.

Please contact me if further information is required.

Elizabeth White

Chief Executive Officer

Victorian Caravan Parks Association