



5 July 2017

Committee Secretary
Public Works and Utilities Committee
Parliament House
George Street
BRISBANE QLD 4000

Via email: PWUC@parliament.qld.gov.au

Dear Sir or Madam

**Electricity and Other Legislation (Batteries and Premium Feed-in-Tariff) Amendment Bill
2017**

Thank you for the opportunity to provide a submission to the Committee on the above Bill. We represent Australia's (and Queensland's) major owners, managers and developers of shopping centres.

Our comments are limited to the aspects of the Bill in relation to customers in embedded networks, including proposed changes to the *Electricity Act 1994* and *Energy and Water Ombudsman Act 2006*. We note that, subject to passage and Royal Assent, these provisions are scheduled to commence on 1 December 2017.

We have been involved in embedded network policy in Queensland, and nationally, over numerous years. We have discussed the Bill with the Department of Energy and Water Supply (DEWS) and thank them for their courtesy and professionalism.

In relation to the second stated objective of the Bill (to align with national regulation), we were involved in the national reform noted in the Explanatory Note and the Minister's second reading speech, specifically amendments to the national electricity rules (NER) to reduce the barriers to competition for embedded network customers. These changes commence on 1 December 2017.

We were a member of the Australian Energy Market Operator's (AEMO) working group that proposed the 'rule change', the Australian Energy Market Commission's (AEMC) consultation, and subsequent AEMO consultation in relation to relevant technical procedures.

We have no opposition to the proposed amendments in the Bill, so long that it does not impose additional costs, outside the national rules, for embedded network owners. Our interpretation is that the amendments will not impose such costs, and the Department has confirmed our interpretation of the Bill.

In relation to the proposed changes to the *Energy and Water Ombudsman Act 2006*, we note that the proposed approach relates only to 'on-market' customers in embedded networks, as opposed to embedded network customers. We understand that access to the Ombudsman Scheme will only be in relation to an on-market customer's supplier issues, and not any embedded network issues, and subsequently, that no cost will be imposed on embedded network owners (e.g. via direct or indirect membership of the Ombudsman Scheme), and further, that embedded network owners will not be bound by any Ombudsman decision. The Department has confirmed our understanding of these provisions of the Bill.

On the broader issue of access to Ombudsman schemes for embedded network customers, we welcome that the Government will consider this issue as part of the national approach to this issue. This includes a current review being undertaken by the Australian Energy Regulator (AER), in collaboration with the Australia and New Zealand Energy and Water Ombudsman Network (ANZEWO).

We are engaged in this issue, including through discussion with the AER and members of ANZEWO. We would urge the Committee to recommend that the Queensland Government continue to participate in this process to ensure a nationally consistent approach.

Please do not hesitate to contact me on [REDACTED], if you need to discuss this submission further.

Yours sincerely

[REDACTED]

Angus Nardi
Executive Director