

5 May 2025

Stephanie Jolly
Executive General Manager, Policy
Australian Energy Regulator
GPO Box 3130
Canberra ACT 2601

Email: AERexemptions@aer.gov.au

Dear Ms Jolly,

RE: Submission to the Review of the AER exemptions framework for embedded networks – Draft decision

Origin Energy (Origin) appreciates the opportunity to provide a response to the (Australian Energy Regulator's (AER's) Draft decision in relation to its Review of the exemptions framework for embedded networks.

We are pleased the AER acknowledges the benefits of embedded networks. Embedded networks not only allow for customer price benefits through the aggregation of load but also provide the physical infrastructure to allow buildings to participate and benefit from the growth in consumer energy resources that would otherwise be prohibitively complex and costly at the individual apartment level.

Origin strongly believes that all customers in an embedded network should have access to essential services at a fair price and, to the extent possible, be afforded retail consumer protections consistent with that provided to mass market retail customers. This should include access to all applicable residential customer rebates and concessions, hardship and family violence policies, and the Energy and Water Ombudsman scheme and associated dispute resolution services.

On this basis, Origin supports the proposed amendments to the Network Exemptions and Retail Exempt Selling Guidelines aimed at extending customer protections to customers in embedded networks. Origin strongly supports customers affected by family violence being provided with safe, supportive, and flexible assistance from their energy retailer and for this support to be provided in a respectful way. We already have a well-established family violence policy that operates in conjunction with our hardship policy to provide assistance to affected customers. We welcome the formal extension of family violence policy to customers in embedded networks.

We also support proposed initiatives to enhance transparency and visibility of embedded networks including the publication of prices. These initiatives will provide the AER with a greater understanding of the embedded network landscape and facilitate on-going communication with networks and sellers. We encourage the AER to continue to work closely with ombudsman schemes to monitor trends in non-compliance. The provision of pricing information brings embedded network customers in line with on-market customers, allowing customers to readily compare prices across the market and will help customers assess the costs and benefits of moving on-market where possible.

We look forward to working with the AER to implement the proposals arising from the review.

If you have any questions regarding this submission, please contact Gary Davies in the first instance at

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Yours sincerely

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Sean Greenup
Group Manager Regulatory Policy

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