Caravan & Camping INDUSTRY ASSOCIATION NSW | Manufactured Housing INDUSTRY ASSOCIATION NSW | Land Lease Living INDUSTRY ASSOCIATION NSW

15 September 2026

Rebecca Holland
General Manager – Compliance and Enforcement
Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601

By email: ***AERexemptions@aer.gov.au***

Dear Ms Holland

CCIA NSW SUBMISSION ON DRAFT NETWORK EXEMPTIONS GUIDELINE AND DRAFT RETAIL EXEMPT SELLING GUIDELINE (VERSIONS 8)

The Caravan Camping & Touring Industry & Manufactured Housing Industry Association of NSW Ltd (CCIA NSW) is the State's peak industry body representing the interests of over 500 holiday parks and residential land lease communities (residential parks, including caravan parks and manufactured home estates).

We also represent over 200 manufacturers, retailers and repairers of recreational vehicles (RVs, including caravans, campervans, motorhomes, camper trailers, tent trailers, fifth wheelers and slide-ons), camping equipment suppliers, manufactured home builders and service providers to these businesses.

Under the Australian Energy Regulator's (AER) current *Network Exemptions Guideline, Version 7, August 2025* (Network Guideline) and *Retail Exempt Selling Guideline, Version 7, August 2025* (Retail Guideline) our holiday park and residential land lease community members are classified as follows:

Holiday Parks

Embedded Network Type	Activity Classes	Requirements
Persons supplying metered or unmetered electricity to occupants of accommodation on a short-term basis within the	Class **ND3** of the Network Guideline	Deemed classes of exemption. Do not need to register with

limits of a site, via a network that they own, control or operate. Note: This includes hotels, motels, inns, holiday flats, holiday cabins, campsites, caravan parks and marinas		the AER, however, they are required to comply with Conditions attached to their exemption
Persons selling metered energy to occupants of accommodation on a short-term basis	Class **D3** of the Retail Guideline	

Residential Parks

Embedded Network Type	Activity Classes	Requirements
Wiring in buildings, or within residential parks or manufactured home estates, with multiple tenants/residents that connects those customers directly to a DNSP	Class **ND08** of the Network Guideline	Deemed class of exemption. Do not need to register with the AER, however, they are required to comply with Conditions attached to their exemption
Persons supplying metered or unmetered electricity in caravan parks, residential parks and manufactured home estates (also known as residential land lease communities) to residents (homeowners and tenants) who principally reside there within the limits of a site, via a network that they own, control or operate	Class **NR4** of the Network Guideline	Registrable classes of exemption. Must register with the AER and comply with the Conditions attached to their exemption
Persons selling metered energy in caravan parks, residential parks and manufactured home estates (also known as residential land lease communities) to residents who principally reside there	Class **R4** of the Retail Guideline	

Mixed Parks

Embedded Network Type	Activity Classes	Requirements
Wiring in buildings, or within residential parks or	Class **ND08** of the Network Guideline	Deemed class of exemption. Do not need to register with

manufactured home estates, with multiple tenants/residents that connects those customers directly to a DNSP		the AER, however, they are required to comply with Conditions attached to their exemption
Persons supplying metered or unmetered electricity to occupants of accommodation on a short-term basis within the limits of a site, via a network that they own, control or operate. Note: This includes hotels, motels, inns, holiday flats, holiday cabins, campsites, caravan parks and marinas **AND** in caravan parks, residential parks and manufactured home estates (also known as residential land lease communities) to residents (homeowners and tenants) who principally reside there within the limits of a site, via a network that they own, control or operate (mixed parks)	Class **NR4** of the Network Guideline	Registrable classes of exemption. Must register with the AER and comply with the Conditions attached to their exemption ***NOTE:*** *Even if a caravan park has only 1 permanent resident, they are required to register their details with the AER under Class **R4** of the Retail Guideline and Class **NR4** of the Network Guideline, despite the majority of their customers being holiday makers.*
Persons selling metered energy to occupants of accommodation on a short-term basis **AND** in caravan parks, residential parks and manufactured home estates (also known as residential land lease communities) to residents who principally reside there (mixed parks)	Class **R4** of the Retail Guideline	

For the purpose of this submission, wherever we refer to 'holiday parks' we are referring to caravan parks that supply/sell energy via an embedded network to occupants of accommodation on a short-term basis (i.e., these are not permanent residents, that is, they are not living in the park).

Wherever we refer to 'residential land lease communities' we are referring to residential parks, including caravan parks and manufactured home estates, that supply/sell energy via an embedded network to residents who live there. This includes caravan parks that supply energy to a few residents (mixed parks) right through to residential land lease communities that are exclusively residential.

As the peak industry body representing holiday parks and residential land lease communities in NSW with embedded electricity networks, the CCIA NSW is an important stakeholder in relation to the AER's *Draft Network Exemptions Guideline Version 8* (Draft Network Guideline) and Draft *Retail Exempt Selling Guideline Version 8* (Draft Retail Guideline). We welcome the opportunity to provide our feedback as relevant to our members.

CCIA NSW understands that the AER intends proposed Conditions 1.20 and 1.21 to apply generally to metered electricity supply arrangements within exempt networks, including registrable exemption classes NR1 to NR6. We appreciate the AER's confirmation (via email to us on 4 September 2026) that the omission of those conditions from *Table 3 Registrable exemption classes – electricity supply* of the Draft Network Guideline was an inadvertent omission and that this will be corrected in the final guideline.

On that basis, CCIA NSW does not oppose the proposed introduction of Conditions 1.20 and 1.21 for holiday parks and residential land lease communities. We recognise that confidentiality of metering data and the security of metering installations are important customer protections and are consistent with the broader objective of ensuring appropriate safeguards for customers in exempt networks.

However, many holiday park and residential land lease community operators are small or medium-sized businesses, as opposed to sophisticated energy market participants with large customer bases, and energy supply is incidental to their core business. While the proposed conditions appear reasonable, these operators may need time to understand the new obligations, review existing arrangements with billing agents, contractors and other service providers, and update internal policies and processes to ensure they can comply in practice.

CCIA NSW therefore requests that the AER include a minimum 6-month transition period from the commencement of version 8 of the Network Guideline before Conditions 1.20 and 1.21 become enforceable for holiday parks (Activity Class ND3) and residential land lease communities (Activity Class NR4). This would give affected operators a practical opportunity to make any necessary compliance changes while still supporting the introduction of these protections.

CCIA NSW also recommends a minor amendment to Condition 1.20(2)(b)(i) to expressly include agents. As drafted, the condition permits disclosure of metering data to an exempt network service provider's employees or related bodies corporate. In practice, many park and community operators rely on billing agents or other third parties to assist with metering, billing and compliance functions. The condition should recognise this operational reality while preserving the confidentiality protections intended by the condition.

We suggest Condition 1.20(2)(b)(i) be amended to read: "its employees, agents or related bodies corporate". This would make the condition clearer and more workable for

exempt network service providers that rely on third-party support to carry out their obligations.

Subject to these comments, CCIA NSW does not have any further feedback on the proposed changes to the Draft Network Guideline or Draft Retail Guideline that are directly relevant to holiday parks and residential land lease communities in NSW.

Conclusion

Thank you for considering our feedback on the Draft Network Guideline and Draft Retail Guideline. As the peak industry body representing holiday parks and residential land lease communities in NSW with embedded networks, CCIA NSW is an important stakeholder in relation to the review of the AER exemptions framework for embedded networks.

Should you have any questions, please contact me at [redacted]

Yours sincerely,

Shannon Skow
Head of Policy & Engagement