



9 November 2015

Australian Energy Regulator  
GPO Box 520  
Melbourne VIC 3001  
Attn. General Manager—Retail Markets Branch

To: Australian Energy Regulator

Re: **Submission to AER Amendments to the Retail Exempt Selling Guideline – Version 4 (September 2015)**

Energy Intelligence is responding in relation to the above consultation.

### **About Us**

Energy Intelligence are an energy management consultancy based in Melbourne. A core part of our services is the implementation and management of embedded networks throughout the NEM. Our clients are typically landlords of multi-tenant shopping centres. We have implemented over 100 embedded networks, being a mixture of greenfield (new sites) and brownfield conversions (retrofits).

### **Retrofitting**

Energy Intelligence welcomes changes to the application of exemptions for retrofitted embedded networks. Namely, where all tenants consent to the creation of the embedded network, a deemed exemption is applicable. We also appreciate the AER recognising that embedded networks offer benefits to tenants, as seen the high signup rates we have traditionally garnered.

We agree with the AER's view that the focus should now revolve around ensuring customers who do not consent are not impacted negatively by the retrofit. This strikes the right balance between benefits to tenants and landlords, while offering flexibility in cases where consent is being unreasonably withheld, which can be to the detriment of the vast majority of tenants within a site.

### **Payment methods (addition of Condition 3.2)**

Energy Intelligence welcomes the requirement of two payment methods, as this provides more flexibility to tenants. We suggest adding a requirement that one payment method must not attract additional surcharges to the tenant, such as direct debit from a bank account.

### **Disconnection for non-payment (clarification of Condition 9)**

Energy Intelligence appreciates the AER's clarification of the wording in this clause, which previously prevented landlords disconnecting commercial tenants for non-payment. This Condition is now closer to the Retail Law.



We are happy to discuss any of these further points with the AER or interested stakeholders.

Kind Regards,

A handwritten signature in black ink, appearing to read 'Mohsin Ali', written in a cursive style.

Mohsin Ali  
General Manager  
Energy Intelligence Pty Ltd