

2nd April 2022

Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601
By email: AERInquiry@ aer.gov.au

To Whom It May Concern

Re: Retail Exempt Selling Guideline Version 6, March 2022 (Draft) – Public Comment

As the CEO of both Gulf Marina Management Pty Ltd and Marina Solutions Pty Ltd we undertake management activities at various marinas across different states in Australia and we have reviewed the proposed changes to the above Guideline regarding its impacts on the marina industry and our business in particular.

Being unaware until recent times that we had an obligation under the National Energy Law, we found it difficult to navigate and even harder to give effect to compliance with the legislation. The Marina Industry Association (MIA) has subsequently provided us with a great deal of comprehensive information and training in this matter.

I am aware that the MIA previously made a submission to the AER for changes in line with the deemed industry exemption for caravan parks which would enable the industry to more easily meet its compliance obligations.

Having read the AER's proposed changes to the above Guideline, we affirm our support for these changes.

We do however ask that you reconsider your position with regard to exempting marinas from these compliance burdens in the same way that the caravan parks industry has been exempted as we see little to no difference in our operations.

If the specific area of "marina berths" (metered and unmetered) could be clarified as a deemed exempt class, it would provide an even greater level of compliance confidence to us and our broader industry.

Thank you for taking our industry concerns on-board and presenting a practical solution for us to seek substantive compliance with the legislation.

Yours faithfully

Andrew Chapman CMM
Gulf Marina management Pty Ltd

CC: info@marinas.net.au