



ISPT Pty Ltd

Kellyville Village

NEW SOUTH WALES

Application for Individual Exemption

7 December 2020

ISPT Pty Ltd

ISPT has a proud record of investing in energy-efficient buildings in line with their corporate values of responsibility and sustainability. ISPT assets include some of Australia’s greenest A Grade office sites and their commercial property portfolio has achieved a high 4.8-star average energy efficiency rating under the National Australian Built Environment Rating System (NABERS). These smarter energy practices are also highly cost-effective, generating **\$30 million in cost savings** for ISPT and our customers and tenants over the past decade.

In the same spirit of sustainable investment practices, ISPT has completed the first two of four phases of a National Solar Project, installing solar photovoltaic (PV) panels on the **rooftops of over 22 properties** across our portfolio. Some **95,000 sqm of solar PV panels installed** across commercial buildings and retail centres began converting sunlight to electricity since late 2017. This renewable energy generates an anticipated 6,600 MWh in a year. ISPT will have over 50 buildings with installed solar once stage four of the project is underway. Facilitated by City of Melbourne, ISPT is also part of the Melbourne Renewable Energy Project (MREP) initiative project, powering the equivalent of more than 25,000 Melbourne households for a year.

In the past 12 months, ISPT has retrofitted an Embedded Network powered with Solar in over 12 of our centres to reduce our risk to the volatile electricity market and to lower the impact of electricity prices to our tenants. ISPT intends to continue to introduce electrical embedded networks at Shopping Centres that are viable. With this, ISPT will look to become the electricity retailer where tenants will purchase power from ISPT at a cheaper rate than the current energy market. **“It’s just one of the ways we’re future proofing our properties and investing in a low carbon future.”**

The capital works to implement the embedded network will be funded by ISPT and consists of the installation of a gate/parent meter which consolidates the usage of all tenants who opt to purchase energy from the embedded network. Tenants opting to purchase power from the embedded network also have their meter upgraded to a NEM compliant embedded network meter during this process.

Following the approval of Phase One of Retrofits and Solar installation of 11 sites in 2018, and 1 Victorian Site in 2020, this application is for the individual exemption of the retrofit of **Kellyville Village, New South Wales**.

The applicant provides the following information in relation to the AER Network Service Provider Registration Exemption Guideline - March 2018.

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Part 1: General information requirement

1. **Your legal name. If you are a body corporate or community corporation, please indicate this.**

ISPT Pty Ltd in its capacity as Trustee of ISPT Retail Australia Property Trust

2. **Your trading name if different to your legal name.**

n/a

3. **Australian Business Number (ABN) or Australian Company Number (ACN).**

ACN 064 041 283

4. **Registered postal address for correspondence. We may verify this information with the Australian Securities and Investments Commission (ASIC) or other relevant agency.**

Level 11, 8 Exhibition Street, Melbourne VIC 3000

5. **Nominated contact person, including their position in the organisation and contact details.**

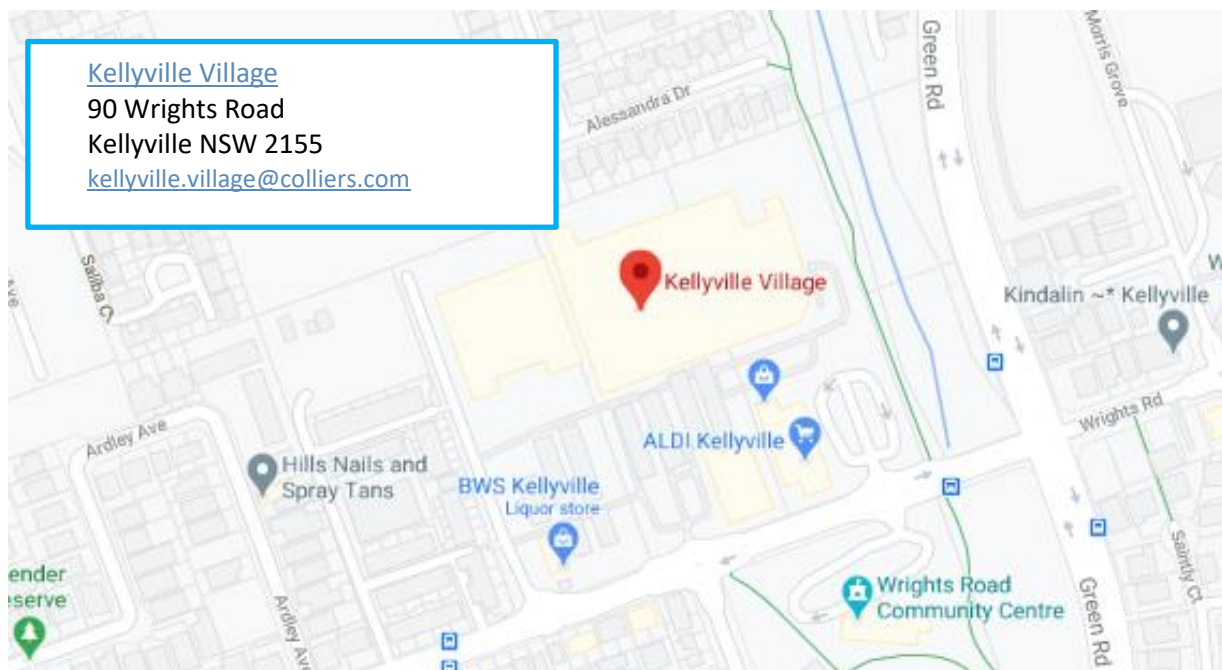
Garry Hendrix
Senior Engineer, Sustainability & Technical Services
0447 222 634
GHendrix@ispt.net.au

6. **Why you are seeking an individual exemption, and why you believe that an exemption (rather than a retailer authorisation) is appropriate to your circumstances.**

The proposed electricity onselling activities are incidental to the Applicant's core business which is leasing of private retail space.

7. **The address of the site at which you intend to sell energy, including a map of the site and a brief description of this site and its current and future use/s.**

Kellyville Village is an existing shopping centre. The Applicant intends to continue the site as a shopping centre in the future.



8. The primary activity of your business (for example, managing a shopping centre).

The Applicant's primary activity is acquiring, development and the ongoing management of shopping centres facilities and assets.

9. The form of energy for which you are seeking the individual exemption (electricity or gas). For electricity, please state whether the network you propose to sell is directly or indirectly connected to the main grid or is (or will be) an off-grid network.

Electricity – the proposed Embedded Network will be connected to both the local network service provider and solar installed at the Shopping Centre.

10. Are you establishing, or have you established, energy supply in an area where there are no other viable energy supply arrangements available?

No

11. The date from which you intend to commence selling energy.

Ideally, 15th March 2021

12. Mailing addresses for premises at the site (where applicable). We may use this information to ensure that potential customers are able to participate in our consultation process.

Attn: Centre Management
 Kellyville Village
 90 Wrights Road
 Kellyville NSW 2155

13. Details of any experience in selling energy, for example:

- **date/s and location/s of previous operations**
- **form/s of energy sold**
- **scale of operations (that is, the number, size and type of customers)**
- **an explanation of which activities will be conducted in-house and which will be contracted out to third parties.**

The Applicant has multiple sites in the NEM where electricity is sold via embedded networks. These Embedded Networks are currently managed through various third party network service providers with the sites highlighted below managed by Energy Intelligence.

SITES	STATE	AER Reference	TENANT #	MWh p/a	TYPE
The Regent	QLD	AER - R0703/12	2	148	Commercial
Mango Hill Marketplace	QLD	E-2783	26	1,444	Retail/Commercial
100 Creek Street	QLD	AER - R0492/12	15	1,734	Commercial
170 Queen Street	QLD	E-2533	11	1,799	Retail/Commercial
155 Queen Street	QLD	AER - R0704/12	2	820	Retail/Commercial
Bracken Ridge Plaza	QLD	AER-N 0710/16 AER - R0115/16	28	1,258	Retail/Commercial
Central Plaza One	QLD	AER - R0199/12	31	2,800	Commercial
Green Square	QLD	AER - R0770/12 AER-N 0830/13	13	1,860	Retail/Commercial

Wintergarden Queen Mall	QLD	AER - R0705/12	76	7,200	Retail/Commercial
19 th Avenue	QLD	E-6047	28	1,126	Retail
Nundah Village	QLD	AER-N 0046/12 R0052/12	36	1,120	Retail
Eastgate Bondi Junction	NSW	E-4812	36	807	Retail
Wagga Wagga Market Place	NSW	IE	89	2,280	Retail
Fletcher Village	NSW	IE	13	339	Retail
Kincumber Village	NSW	IE	19	479	Retail
Richmond Market Place	NSW	IE	62	916	Retail
Winmalee Village	NSW	E-4524	29	662	Retail
Warners Bay Village	NSW	E-4698	21	490	Retail
Kiama Village	NSW	E-4689	13	380	Retail
Dee Why Grand	NSW	E-4501	36	1,019	Retail
Central West	VIC	E-5320	27	1,730	Retail
Bendigo Market Place	VIC	E-5319	104	1,840	Retail
Barkly Square	VIC	E-5318	40	1,070	Retail
Karingal Hub	VIC	E-5321	105	3,880	Retail
Showground Village	VIC	AER-N 0043/14	32	2,270	Retail
206 Bourke St	VIC	E-5207	31	1,900	Retail
447 Collins St	VIC	E-5665	58	3,415	Commercial
Waurm Ponds Shopping Centre	VIC	E-6472	98	1,110	Retail
Gungahlin Village	ACT	E-5277	48	455	Retail

The Applicant will outsource the following to the Applicant's elected Embedded Network Service Provider; **Energy Intelligence Pty Ltd**;

- retrofitting of the embedded network including the consent campaign, sales and marketing of small and large customers
- metering services, data, billing and management of the embedded network
- issuing tenant bills in the format compliant with the AER and the ESC's Core Exemption Conditions
- management of all relevant licences and compliance with all applicable legislation
- customer management service including Dispute Resolution policy and a specific COVID-10 Hardship Policy, Financial Hardship, flexible payment options and
- the appointment of Energy Intelligence (INTELENM) as the ENM

14. **Whether you currently hold, or have previously held or been subject to, an energy selling exemption or a retail licence (retailer authorisation) in any state or territory. If so, please provide details.**

Sites in the NECF states have obtained Registered Retail Exemptions (R1 and R5) and Network Exemptions (N1 and N5). Sites in VIC have obtained a Network Exemptions (N1 and N5) and in addition are registered with the ESC.

The Applicant does not hold a retail license/authorisation.

15. **What arrangements you have made in the event that you can no longer continue supplying energy (e.g., has the retailer that sells to you agreed that they will service the customers).**

If the Applicant could no longer supply energy to tenants in the embedded network, the metering configuration allows tenants to enter into a supply arrangement with an authorised retailer of their choice.

Part 2: Particulars relating to the nature and scope of the proposed operations

16. Will your customers be your tenants? If so, are they residential or commercial/retail

Yes, the customers will be the Applicant’s tenants in the Shopping Centre and are retail businesses.

The retail business tenants are covered by the relevant state-based Retail Shop Leases Act.

There will not be any residential customers in the Embedded Network.

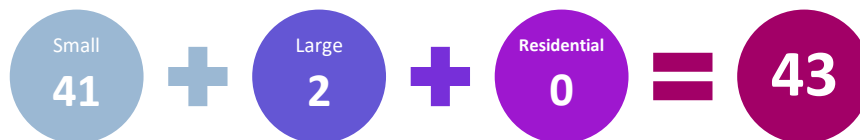
17. Are you providing other services (for example, accommodation/leasing of property) to persons on the site who you intend to sell energy to? Or will your only commercial relationship to persons on the site be the sale of energy? If you are providing other services, please specify what these services are, and the contractual or leasing arrangements under which these services are being provided.

The Applicant’s primarily relationship with the tenants is the provision of retail leasing space, which are provided under a lease signed between the tenant and the Applicant.

The leases to retail tenants will be covered by the relevant Retail Shop Leases Act.

18. What is the total number of customers at the site? Please provide a breakdown between residential and business customers (and whether they are small or large as defined for the jurisdiction in which you intend to operate).

The customers at Kellyville Village proposed Embedded Network are all retail/business customers. There are 41 Small business customers and 2 Large customers that will be part of the proposed Embedded Network. 4 tenants are not included in the figures below as they will *not* be part of the Embedded Network. There are NO residential customers.



19. Will you be on-selling energy (that is, selling energy purchased from an authorised retailer) or purchasing it directly from the wholesale market?

The Applicant will be on-selling energy from an authorised electricity retailer and renewable power generated from solar.

20. What is the estimated aggregate annual amount of energy you are likely to sell (kilowatt hours or megawatt hours for electricity and mega joules or gigajoules for gas) and the average expected consumption of customers for each type of customer you service (that is, residential customers and retail or commercial customers)?

Annual Consumption	Average Small	Average Large	Residential
1,700 MWh	36 MWh	150 MWh	n/a

21. Will your customers be wholly contained within a site owned, controlled or operated by you? (For the purposes of this question, a body corporate n may be taken to ‘operate’ premises it oversees).

Yes

22. **Will each premises/dwelling be separately metered? If the application is for a new development or a redevelopment and customers will not be separately metered, please explain why not. For unmetered supply, state how you will determine energy charges?**

Yes, each premises will be separately metered.

23. **Will meters allow your customers to change retailers (i.e. not buy their energy from you) as required by the AER's Network Guideline?**

Yes, all metering installation will conform to current standards for NEM metering as outlined in Chapter 7 of the NER. All metering installations used in the proposed exempt network are fit for purpose and for full retail contestability if the customer elected to purchase from their retailer of choice and will meet the current *minimum services specification* for all metering installation.

An ENM will be appointed.

All meter data will be managed by an accredited MC/MDA/MP.

24. **In what form and how often will customers be billed? Will you be issuing bills yourself or through a billing agent?**

Energy Intelligence will issue tenants' with monthly bills in the format compliant with the AER Core Exemption Conditions.

It is the intention of the Applicant to use the services of an AEMO accredited MC, MP and MDA to supply, install, commission and manage the data. The consumption to calculate the tenant's bills are based on NEM12 data that is sent remotely to Energy Intelligence' internal system via an MDA daily. The NEM-12 files will include half-hourly data.

The preference are for bills to be sent via email however tenants have the options of receiving their bills via Post.

25. **What dispute resolution procedures do you intend to put in place to deal with energy related complaints and issues? Confirm whether it is consistent with the Australian Standards: AS/NZS 10002:2014 Customer Satisfaction – Guidelines.**

Energy Intelligence and the Applicant has a successful history in dealing with disputes as there have been minimal reported. One of the foremost reasons why disputes are minimal is the long term structured relationship between the lessor and lessee. Leases can range between 5 to 25 years and as such it is in the best interest of the ENO to identify and resolve issues with their customers. Most calls are managed and resolved whilst the customer is on the phone. Common queries are around rates, how to pay or contact updates.

The Applicant will be utilising Energy Intelligence's Customer Services resources to manage energy enquiries and disputes. Energy Intelligence manages over 100 Embedded Network across Australia, with the majority of their portfolio being Shopping Centres. Their dispute resolution procedure has been reviewed and accepted, as part of the ENM accreditation and adheres to Australian Standards and is consistent with AS/NZS 10002:2014.

The purpose of the Energy Intelligence Complaints and Dispute Resolution Policy is to:

- Recognise, promote and protect customer's rights to complain about their dealings with Energy Intelligence.
- Ensure that an accessible complaints management process is in place.
- Take appropriate action to resolve complaints as required.
- Provide a mechanism for resolving complaints in a timely, efficient and courteous manner.

- Inform the right to request a meter test.
- record, assess and review complaints on an ongoing basis in order to improve the service we provide and products we offer.

Energy Intelligence Complaints and Dispute Resolution Policy recognises that all individuals have the right to complain, have their complaint heard and be treated with dignity and respect. Each complaint is addressed in an equitable, objective and unbiased manner. When a customer raises a complaint related to their electricity, the complaint is expected to be resolved within a reasonable timeframe, having regard for the nature and complexity of the complaint. Tenants are always kept well informed. Where the complaint has been escalated to senior management and the tenant is still not satisfied the dispute has been resolved, the tenant may have the matter heard by NCAT.

Since the requirement for all Victorian Embedded Networks to become a member of EWOV in July 2018, the Applicant has had no complaints/cases reported. Energy Intelligence is also a member of EWON.

In April 2020, Energy Intelligence released a COVID-19 Hardship Program in addition to their Hardship Program in response to the current pandemic. This policy supports the AER and the ESC expectations.

26. Please provide any further information that you consider would assist us to assess your application.

The Applicant request that the AER considers this application as the Applicant has written to all tenants advising them of its plans to implement a retrofitted Embedded Network at Kellyville Village.

Disclosure to tenants

The Consent Campaign commencing February 2020. As a part of the information and education campaign to tenants, the Applicant has fully disclosed information as required in the *ENSP - Registration Exemption Guideline* – refer to *Appendix A - Consent Form* for a copy of this disclosure for existing tenants. The Applicant also disclosed a copy of the Sale of Energy Agreement between the Applicant and the tenant – refer *Appendix B - Sale of Electricity Agreement* for a sample agreement. All tenants that are part of the Embedded Network have been provided with the Consent Form, the *Sale of energy agreement, Terms and Conditions* and *Important information about the Embedded Network*.

High acceptance by tenants

Through the education and marketing phase, the Applicant has obtained explicit informed consent from the vast majority of the tenants at Kellyville Village. Over 88% of all affected tenants have provided such consent and we are continuing efforts to obtain explicit informed consent for the remaining tenants.

Mitigation of detriment - state or territory legislation

As “on-market child” NMs allow tenants to purchase energy from an authorised retailer, the Applicant sees no detriment in state legislation that needs to be mitigated.

The Applicant has undergone a thorough process to obtain explicit informed consent from all tenants at Kellyville Village regarding the proposed embedded network installation. The process the Applicant has undertaken is:

- Initial communication in writing to all tenants regarding the proposal, including notification of their right and limited ability to choose a retailer (see *Appendix A - Consent Form*).
- Follow up communications made by Energy Intelligence (the Applicant’s subcontractor), including emails and calls to all tenants.
- Several site visits to the Shopping Centre to discuss any questions or concerns made by tenants’ face to face. The site visits were reduced during COVID-19 to ensure the safety of staff, their family and the greater community.
- Notification of AER’s formal public consultation process (refer *Appendix A - Consent Form* and *Appendix G - AER Consultation Notice*).

- Attempts to mitigate concerns of non-consenting tenants. Please refer to *Appendix D - Mitigating non-consenting customers* for more information on the Applicant's approach to mitigating these concerns specifically.
- If an affected customer displays signs of a limited capacity to provide explicit informed consent, we will address these as they arise. There have been no instances of any signs of any limited capacity to voluntarily provide explicit informed consent.
- The Applicant requests consenting tenants sign a separate Consent Form (copy listed in *Appendix A - Consent Form*) and stores electronic copies of the executed consent forms on file (see *Appendix E - Signed Tenancy Consent Forms*).

Information provided to tenants informing them about the embedded network retrofit include

- Retrofit and what this means
- Retail contestability and their freedom of choice
- A tenant's ability to enter into an energy only contract with an authorized retailer and that their choice of retailers may be restricted as some retailers are unable to bill energy only.
- Two invoice scenario for Tier 2 customers
- Possibility of receiving a duplication of charges in the initial EN stage and the ENO's endeavour to rectify this
- An obligation to remedy any duplication of network fees
- Power of Choice Meters that will be installed
- Electricity offer matching as per conditions 4.9.3 and 4.9.4 of the NSP Exemption for the life of their lease (see *Appendix H - Price Guarantee Letter*).
- A sales agreement for prospective tenants
- Dispute resolution procedure (see *Appendix J – Dispute Resolution Policy*).
- Applicant will cover any exit fees if incurred by tenants affected by the Embedded Network retrofit

Part 3: Converting embedded networks (retrofitting)

Provision of information

You must confirm you have evidence that consumers have been provided with the following information:

27. that you are planning to retrofit the site as an embedded network and this will require metering changes

Yes, all tenants have been issued a Letter of Intent and information about the metering changes is included in the Embedded Network Retrofit document.

28. that consumers retain the right to contract with a retailer of choice even after inclusion in the embedded network (except where this right does not exist due to jurisdictional legislation)

Yes, all tenants have been issued a Letter of Intent and information about the consumers retain the right to contract with a retailer of choice is included in the Embedded Network Retrofit document.

29. that in order to exercise their right to a retailer of choice, consumers may need to enter into an 'energy only' contract, which is offered at retailers' discretion and may be difficult to obtain

Yes, all tenants have been issued a Letter of Intent and information about 'energy only' contract is included in the Embedded Network Retrofit document.

30. that customers in embedded networks may not receive the same protections as those of an authorised retailer under the Retail Law, including access to ombudsman schemes.

Yes, all tenants have been issued a Letter of Intent and information about 'the customer not receiving the same protection' is included in the Embedded Network Retrofit document.

In addition, you need to confirm that you have provided consumers with:

31. your electricity sales agreement, which details all fees and tariffs

Yes, all tenants have been issued the Sale of Electricity Agreement which includes all fees and tariffs and Terms and Conditions. All tenants were also emailed an updated Terms and Conditions in November 2020 - see *Appendix G - AER Consultation Notice*.

32. the contact details of a representative from your company to answer any queries or concerns about the planned retrofit.

Yes, both the Applicant's representative contact details was provided in the Letter of Intent and the Embedded Network Retrofit document. Energy Intelligence representative's contact details is provided in all the emails to tenant.

33. In your application you need to include samples of the information you have provided to consumers.

Please see the following Appendix

- Appendix A - Consent Form
- Appendix B - Sale of Electricity Agreement
- Appendix F - Proposal for an Embedded Network + Attachment 1, 2 and 3
- Appendix G - AER Consultation Notice
- Appendix H - ISPT Price Guarantee Letter

Explicit informed consent

To demonstrate that you have obtained customer consent you need to address the following:

34. confirm you have evidence of written consent from all customers affected by the retrofit

Yes, we have received written consent of 37 tenants as of the 4th November 2020 out of 43 tenants. This equates to 88% of tenants that will be affected by the proposed retrofit. See Table on the right. *Please note we do not obtain consent from Vacant tenancies or tenancies that will not be part of the Embedded Network and so are excluded from the Consent %.*

Status	#	%
Vacant	1	
Non Consent	4	10%
Pending	1	2%
Consent	37	88%

See *Appendix C – Consent Campaign Tenant Log*.

35. confirm that consent was sought separately from customers for the retrofit and the energy sale agreement

The Applicant requests consenting tenants sign a separate Consent Form (copy listed in *Appendix A - Consent Form*) and stores electronic copies of the executed consent forms on file (*Appendix E - Signed Tenancy Consent Forms*).

See *Appendix C - Consent Campaign Tenant Log* for more details including communication logs from tenant’s who have either not provided a response or have expressed explicit no’s.

36. if customers expressed concerns, provide evidence of your attempts to resolve them.

See *Appendix D - Mitigating non-consenting customers* for more information.

Retail contestability

To demonstrate you have addressed any potential customer detriment resulting from a loss of retail contestability, you must confirm whether you have:

37. sought advice from the distributor about whether non-consenting customers can be wired out of the embedded network

Where a centre has tenants who are unwilling to provide consent, the Applicant along with their preferred electrical engineer and site electrician will review the options of wiring the tenant out of the EN. At this stage, there is 1 tenant confirmed to maintain a direct connection to the distributor and 1 under review. Energy Intelligence has project managed numerous retrofits and greenfield Embedded Networks and has a good working relationship with Endeavour Energy and have a good understanding of their requirements and policy including their connection separation policy required for tenants to be wired out.

See *Appendix C - Consent Campaign Tenant Log* for more details .

38. taken steps to ensure that customers who wish to remain with their retailer, but cannot be wired out, will not be financially disadvantaged by the retrofit. Measures to reduce financial detriment are likely to include price matching for affected customers and taking financial responsibility for any double billing of network charges.

As per the requirements of the Retail Exempt Selling Guideline, we have mitigated this detriment by:

- The Applicant has notified all tenants via emails, phone calls and site visits to tenants at site; of a right to choose their own retailer, that they will receive two invoices if they choose not to purchase

energy from the Applicant, and (for non-consenting tenants) that the Applicant will price match any genuine electricity offer that would be available to that grid connected customer.

- Where a tenant has requested to remain with their authorised retailer, the Applicant will facilitate competition by allocating “on-market child” NMIs to all tenants who choose to purchase energy from an authorised retailer. This allows tenants to remain with their existing authorised retailer under their current contract arrangement.
- The Applicant will seek to preserve access to existing contractual arrangements for large customers on C&I contracts.
- Once the embedded network is installed, the Applicant will notify all authorised retailers to inform them that either
 1. the tenant has chosen to purchase energy from the Applicant (off-market), and request to cease billing from the date of embedded network install, or
 2. the tenant has chosen to continue to purchase energy from their authorised retailer (on-market), and to cease invoicing for network charges effective the date of embedded network install. The Applicant has appointed an ENM to follow up with relevant market participants to request the AEMO Market Settlements and Transfer Solution (MSATS) is updated to reflect the embedded network installation minimising instances of double charging. The ENM will work closely with the retailer to ensure they are billing suitably. AEMO has a number of publicly available factsheets including one to assist retailers in the process of making offers to embedded network customers. This document clearly displays the roles and responsibilities of market participants, aiding in the resolution of any incorrect charges.
- Where a tenant notifies the Applicant of double charging, the Applicant’s agent will follow up with the relevant market participants to ensure the retailer is billing suitably. This is predicated on the tenant providing a Letter of Authority to engage with their authorised retailer on their behalf.
- The Applicant commits to ongoing annual price reviews to ensure the rates on-sold are competitive to rates a tenant would otherwise receive from authorised retailers and below the Default Market Offer. Tenants will also be provided in writing a minimum of 5 days advance notice prior to any change in tariffs and charges.

Customer dispute resolution services

39. Have you advised customers of your dispute resolution process and options for external dispute resolution, such as ombudsman schemes?

The Consent Form (*Appendix A - Consent Form*) has the dispute resolution process that will apply for the embedded network at Kellyville Village. This resolution process also lists the customer’s ability for recourse to NCAT - NSW Civil & Administrative Tribunal if they are not satisfied with the internal dispute resolution. This is also noted in the Terms and Conditions provided to the tenants and in the Customer Charter that will accompany their first bill.

AER Consultation

40. You must confirm you have advised consumers of the AER’s consultation process. In particular, you must make consumers aware that the AER consults on individual exemption applications and will publish your application on its website and invite public submissions.

The tenants have been advised both in the Consent Form as well as an additional email sent in November notifying tenants that we are in the process of submission and the process includes

- a thorough review by the AER and if accepted

- will undergo public consultation for 20 business days which would be available on the website
- the AER will accept public submissions and that we would notify the tenants when the public consultation was made available including links to the public consultation.

See *Appendix G - AER Consultation Notice*. Notice of the open consultation process will be sent to tenants by email once the AER initiates the public consultation process.

Appendix

Accompany documents – strictly confidential

- Appendix A - Consent Form
- Appendix B - Sale of Electricity Agreement
- Appendix C - Consent Campaign Tenant Log
- Appendix D - Mitigating non-consenting customers
- Appendix E - Signed Tenancy Consent Forms
- Appendix F - Proposal for an Embedded Network
- Appendix F - Proposal for Embedded Network - Attachment 1
- Appendix F - Proposal for Embedded Network - Attachment 2
- Appendix F - Proposal for Embedded Network - Attachment 3
- Appendix G - AER Consultation Notice
- Appendix H - Price Guarantee Letter
- Appendix I – Bill Sample
- Appendix J – Dispute Resolution Policy