



14 July 2015

To: Australian Energy Regulator
Via email

Re: Application for Individual Embedded Network Exemption -
Bathurst City Centre Shopping Centre

To whom it may concern,

I am writing to request an individual embedded network exemption on behalf of the following client.

General Information

1. Name: Novion Property Group Pty Ltd
2. Trading name: Bathurst City Centre Shopping Centre
3. ABN / ACN: 39 060 482 635
4. Postal address: Level 28, 35 Collins Street
Melbourne Victoria 3000
5. Contact: Craig Swift
Electricity Onselling Manager
03 9936 1204
craig.swift@vicinity.com.au
6. Reason for application: Conversion of existing brownfield site under classification R1 & R5. The proposed on-selling activity is incidental to the owner's core business of managing the shopping centre.
7. Site address: Bathurst City Centre Shopping Centre, 210
Howick St, Bathurst NSW 2795
8. Primary business: Shopping centre owner / manager
9. Energy form: Direct grid connected electricity
10. Supply arrangements: All tenants currently have access to grid supply.
11. Commencement date: 1 October 2015



12. Tenant details: c/o Centre Management Office, Bathurst Shopping Centre, 210 Howick St, Bathurst NSW 2795
13. Experience: Novion Property Group Pty Ltd will be using the services of Energy Intelligence and Energy & Plant Management in meeting their license exemption obligations.
14. Current exemptions held: Novion Property Group Pty Ltd currently on-sells electricity at a number of locations around Australia. The details of these sites are all registered with the AER.
15. Cessation arrangements: In the unlikely event Novion Property Group Pty Ltd can no longer on-sell electricity to tenants inside the embedded network, tenants have the ability to select their own retailer for supply.

Particular Information

1. All tenants at site operate under commercial lease agreements with Novion Property Group Pty Ltd.
2. As above.
3. Approximately 51 small commercial tenants.
4. Energy will be purchased from a licensed energy retailer and on-sold to tenants.
5. Energy will be purchased from a licensed energy retailer under a large market retail contract.
6. Approximately 1,437 MWH pa.
7. All customers are tenants of the shopping centre.
8. Each tenancy will be separately metered.
9. Manually and/or remotely read interval meters will be installed for tenants who choose to take supply from the embedded network.
10. All meters will comply with the National Measurement Act (1960) and satisfy NMI standards.



11. Meters will be read monthly.
12. Not applicable as all tenants are separately metered.
13. Tenants will be billed monthly on utility accounts using a third party billing agent.
14. Dispute resolution will be managed as per the commercial lease agreements in place with each tenant.
15. Not applicable.
16. Not applicable.
17. In converting the site into an embedded network, Novion Property Group Pty Ltd will write to all tenants advising them of its plans to create an embedded network. As part of this communication, all tenants will be advised of their right to purchase electricity from a licenced retailer. Other information provided to the tenant shall also meet the conditions specified by the AER in Appendix A-2 of their Exempt Selling Guideline.

To ensure tenants are not disadvantaged by being within the embedded network, where a tenant's existing licensed electricity retailer is unable or unwilling to provide a tenant with an "energy only" account, Novion Property Group Pty Ltd will offer to match the price the tenant was paying prior to the creation of the embedded network.

Where a tenant elects to exercise their right to purchase electricity from a license retailer of their choice, Novion Property Group Pty Ltd shall invite the tenant sign a Letter of Authority allowing access to their meter data for the purposes of timely billing of their regulated (shadow) network tariff. This letter further acknowledges that the tenant is providing their consent in the creation of the embedded network at site.

Please do not hesitate to contact me should you have any queries with regards this application.

Kind Regards,

David Regenspurger
Managing Director
Energy Intelligence Pty Ltd