

[AER \(Retail\) Exempt Selling Guideline – March 2018](#) (Appendix B)

**Instructions:**

1. Submit this completed checklist as part of your application (alongside a cover letter and evidence to support Section 3 of the checklist).
  - a. Please submit applications in DOCX (Microsoft Word) format where possible.
2. If we identify that information in the application is missing or needs to be expanded upon, we will ask for further information before accepting your application. However, we will only provide feedback to applicants once for each application.
3. Upon acceptance, your application will be published on the AER website for public consultation. The consultation period will run for 20 business days.
4. If your application includes confidential information, please submit two versions – one marked confidential and one marked public.
  - a. The **public version** of the document should remove the confidential material and replace the relevant sections with the word ‘confidential’. Deleted text should be left blank to retain the same formatting and page numbers as the confidential version. This version will be published for consultation.
  - b. Confidential information will be handled in accordance with the [ACCC/AER Information Policy](#).

**Prerequisite requirements**

Requirement	Applicant’s Response
Please confirm that you understand the instructions listed above.	Yes

**Section 1: General information requirements**

Requirement	AER Guidance	Applicant's Response
1. Legal name of the Applicant.	<p>The Applicant must be a legal person, for example an individual, company, corporation or body corporate.</p> <p>A trust is not a legal person and cannot hold an exemption. If you are seeking an exemption for a trust, a trustee must apply.</p>	Stockland Aevum Limited ( <i>part of the Stockland Group</i> )
2. Trading name (if different to legal name).		Cardinal Freeman The Residences
3. ABN or ACN.	<p>Use the <a href="#">ABN Lookup online search</a> to check that the ABN matches the legal name you have provided.</p> <p>Use the <a href="#">ASIC Connect website</a> to check that the ACN matches the legal name you have provided.</p>	ABN: 80 087 648 691
4. Registered postal address for correspondence.		137 Victoria Street, ASHFIELD NSW 2131

Requirement	AER Guidance	Applicant's Response
5. Nominated contact person, their position and contact details.		<p>Damian Arsenis General Manager <b>Network Energy Services</b> PO Box 2296 MOUNT WAVERLEY VIC 3149 Phone: 03 9807 5286 Email: damian@networkenergy.com.au</p> <p>Fiona Russell Village Manager <b>Cardinal Freeman The Residences</b> 137 Victoria Street, ASHFIELD NSW 2131 Phone: 02 8753 2222 Email: fiona.russell@stockland.com.au</p>
6. Reasons for seeking an individual exemption (rather than an authorisation).	See: Section 3 of the <a href="#">Retail Exempt Selling Guideline</a> .	Stockland is seeking an individual exemption for the Glentworth House and Seaview Heights sections of Cardinal Freeman The Residences because Stockland's Retirement Living division's core business is as owner and operator of retirement villages and the on-selling of electricity is incidental to their core business.
7. Site address and description of current and future use/s.	Also attach a site map as an appendix to this checklist.	<p><b>Site Address:</b> 137 Victoria Street, ASHFIELD NSW 2131</p> <p><b>Description of Use:</b> Retirement Village</p> <p><b>Site map submitted with application?</b> Yes (Appendix A)</p>
8. Primary activity of the Applicant's business.	<p>Examples may include but are not limited to:</p> <ul style="list-style-type: none"> <li>• caravan park operator: provision of accommodation</li> <li>• body corporate: management of common property</li> </ul> <p>See also Section 2 below.</p>	The primary business of Stockland's Retirement Living division is through owning and operating retirement villages. Cardinal Freeman The Residences is just one of their retirement villages as part of a significant portfolio (60+) of locations across Australia.

Requirement	AER Guidance	Applicant's Response
9. Form of energy for which the Applicant is seeking an individual exemption.	For electricity, state whether the network through which the Applicant proposes to sell is either <b>directly or indirectly connected to the main grid</b> OR is/will be an <b>off grid</b> network.	The individual exemption is requested for the sale of electricity within the Glentworth House and Seaview Heights sections of Cardinal Freeman The Residences.  Cardinal Freeman The Residences is already directly connected to the main grid.
10. Is the Applicant establishing, or have they established, energy supply in an area where there are no other viable energy supply arrangements available?	If not, please provide examples of how customers will be able to access alternatives, should they choose to utilise their power of choice.	No. The Glentworth House and Seaview Heights buildings contain apartments which are currently all individually connected directly to the grid.
11. Proposed commencement date for the sale of energy.		The planned date is 18 August 2021 subject to AER approval
12. Mailing address for site correspondence.		137 Victoria Street, ASHFIELD NSW 2131

Requirement	AER Guidance	Applicant's Response
<p>13. Details of the Applicant's (or an agent's) energy selling experience (under an exemption and/or authorisation).</p>	<p>Include:</p> <ul style="list-style-type: none"> <li>• Date/s and locations of previous operations</li> <li>• Form/s of energy sold</li> <li>• Scale of operations (that is, the number, size and type of customers)</li> <li>• An explanation of activities to be conducted by the Applicant and what activities will be contracted out to third parties.</li> </ul>	<p>Stockland's Retirement Living division is currently the exempt seller of electricity in 17 existing retirement villages and almost 3,500 customers (residents) across New South Wales, Queensland and Victoria.</p> <p>The details of each of these embedded networks are contained within Appendix B.</p> <p>Stockland is responsible for the parent meter electricity supply contracts and also the payment of the parent meter bills.</p> <p>Stockland has engaged Network Energy Services to provide the following services for the management of the Cardinal Freeman The Residences embedded network:</p> <ul style="list-style-type: none"> <li>• Facilitate the retrofit of the Glentworth and Seaview Heights sections of Cardinal Freeman The Residences, including the provision and facilitation of all required resident communications and documentation.</li> <li>• Meter reading, resident billing, payment collection (via a suite of payment options), customer service (including financial hardship, complaints handling and dispute resolution and facilitation of relevant concessions) and embedded network management services.</li> <li>• Embedded Network Manager function</li> </ul> <p>Stockland also contracts The Energy Project to provide expertise and guidance with embedded network compliance.</p>
<p>14. Does the Applicant currently hold, or have they previously held or been subject to, any energy selling exemptions or retail licences (retail authorisation) in any state or territory?</p>	<p>If yes, provide the AER reference numbers, if applicable.</p>	<p>Stockland's Retirement Living division currently holds AER Network Exemptions for 17 retirement village sites (NR3), including Cardinal Freeman The Residences. They also have AER Retail Exemption (R3) for all sites located in NSW and QLD, while sites in Victoria are registered with the Essential Services Commission (ESC).</p> <p>Neither Stockland nor its nominated service provider Network Energy Services holds a retail license.</p>

Requirement	AER Guidance	Applicant's Response
<p>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).</p>	<p>For example, has the retailer that will sell energy to the applicant agreed to service the customers if the applicant is ever unable to do so?</p>	<p>In the unlikely event that Stockland could no longer continue supplying the electricity to residents in Cardinal Freeman The Residences, Stockland and Network Energy Services will assist customers to transition to an electricity retailer of their choice.</p> <ul style="list-style-type: none"> <li>• The metering within the Glentworth House and Seaview Heights sections are currently supplied by Ausgrid, and are old mechanical meters which are housed on old co-located meter panels that do not currently adhere to current Service and Installation Rules (SIRs).</li> <li>• As part of the transition to the embedded network, Stockland will invest in replacing the current co-located meter panels to adhere to current SIRs.</li> <li>• An accredited Meter Provider (MP) will install Automated Meter Reading (AMR) capable meters. The meters to be installed are Secure Liberty Single Phase Meters with the Sim cards removed .This metering option will allow consumers to access retailer market offers should they ever choose, by re-inserting the Sim if they ever needed to be active within the market. In the meantime, all meters within Cardinal Freeman can be manually read in the same way as the current meters in place within the existing embedded network.</li> <li>• Stockland undertake to incur any necessary metering costs and take whatever action is required to facilitate resident access to retailers in the event that Stockland discontinued electricity on-selling.</li> <li>• Network Energy Services are experienced with facilitating embedded network customer movements in the Ausgrid region and would liaise with the relevant authorities to facilitate the transition of customers.</li> </ul>

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

Requirement	AER Guidance	Applicant's Response								
<p>16. Will the Applicant's customers be their tenants?</p> <p>Are tenants at the site residential or business customers?</p>		<p>The applicant's customers are residents within the retirement village, under a whole of life lease arrangement.</p> <p>They will be residential customers.</p>								
<p>17. Is the Applicant providing other services to tenants or residents on the site to whom they intend to sell energy?</p> <p><b>OR</b> will their only relationship to the persons on the site be the sale of energy?</p>	<p>If other services are provided, specify what they are and the contractual or leasing arrangements under which these services are being provided.</p>	<p>Yes, Stockland Cardinal Freeman provides many services to residents who enter into a whole of life lease agreement (99 years) with Stockland Cardinal Freeman, regulated under the Retirement Villages Act 1999</p> <p>Primarily this relates to retirement village residents, with services and facilities included as part of the terms; e.g. gym, pool, library, recreation, function rooms, gardens and common use areas etc.</p>								
<p>18. Total number and breakdown of customers at the site</p>		<table border="1" data-bbox="961 846 1577 987"> <thead> <tr> <th data-bbox="961 846 1144 927">Residential</th> <th data-bbox="1144 846 1314 927">Small business</th> <th data-bbox="1314 846 1472 927">Large business</th> <th data-bbox="1472 846 1577 927">Total</th> </tr> </thead> <tbody> <tr> <td data-bbox="961 927 1144 987">79</td> <td data-bbox="1144 927 1314 987">0</td> <td data-bbox="1314 927 1472 987">0</td> <td data-bbox="1472 927 1577 987">79</td> </tr> </tbody> </table> <p>There are 79 residential apartments across the Glentworth House and Seaview Heights sections of Cardinal Freeman The Residences, only 67 of which are currently occupied. The 12 that are vacant have the costs internally managed by Stockland at the present time.</p>	Residential	Small business	Large business	Total	79	0	0	79
Residential	Small business	Large business	Total							
79	0	0	79							
<p>19. Will the Applicant be on-selling energy purchased from an authorised retailer or purchasing it directly from the wholesale market?</p>		<p>The site will be on-selling electricity that is purchased from a licensed retailer. The energy supply contract will be arranged between Stockland and their appointed licenced retailer.</p>								

Requirement	AER Guidance	Applicant's Response
<p>20. What is the estimated aggregate annual amount of energy the Applicant is likely to sell (KW/h, MW/h and mega joules or gigajoules for gas)?</p> <p>What is the average expected annual consumption of each of the types of customers they service?</p>		<p>The forecast annual electricity load for the Individual Exemption is summarised as per below:</p> <ul style="list-style-type: none"> <li>• Glentworth House (including Chapel) &amp; Seaview Heights: 246,000 kWh</li> <li>• Serviced Apartments: 169,000 kWh</li> <li>• <b>Total: 415,000 kWh</b></li> </ul> <p>The average resident is anticipated to be approximately 3,000 kWh per annum.</p> <p>Glentworth House and Seaview Heights have been primarily mentioned in the application since these are the sections where consumers will be transitioning into an embedded network environment. There are some Stockland electricity meters that will be transitioning across into the embedded network, which includes common light and power meters, and also a meter that supplies a Serviced Apartment Building.</p> <p>The Serviced Apartment building which is mentioned in the application is managed by Stockland and it is not currently located within the legacy embedded network. The residents within the Serviced Apartments are not separately metered and they are not charged independently for their electricity consumption, but rather it is incorporated into their rent.</p> <p>As part of the works the Serviced Apartment building will also be incorporated into the embedded network. This is included in the application to provide clarity and transparency relating to Stockland's desire to have all the facilities on site to be included within the embedded network.</p>
<p>21. Will the Applicant's customers be wholly contained within a site owned, controlled or operated by the applicant?</p>		<p>Yes, all customers will be wholly contained within this site which is both owned and operated by Stockland.</p>



Requirement	AER Guidance	Applicant's Response
<p>22. Will each premise/dwelling be separately metered?</p>	<p>If the application is for a new development or redevelopment and customers will not be separately metered, explain why not.</p> <p>Explain how customers will be charged if consumption cannot be metered</p>	<p>Yes, all apartments and locations will be separately metered.</p>
<p>23. Please confirm these meters will allow the Applicant's customers to change retailers as required by the AER's Network Guideline.</p>	<p>Specify the types of meters to be installed at the property and confirm that they will allow customers to change retailers.</p>	<p>An accredited Meter Provider (MP) will install Automated Meter Reading (AMR) capable meters. The meters to be installed are Secure Liberty Single Phase Meters with the Sim cards removed .This metering option will allow consumers to access retailer market offers should they ever choose, by re-inserting the Sim if they ever needed to be active within the market. In the meantime, all meters within Cardinal Freeman can be manually read in the same way as the current meters in place within the existing embedded network.</p>
<p>24. In what form and how often will customers be billed?</p> <p>Will the Applicant be issuing bills or through a billing agent?</p>	<p>Provide a bill template.</p>	<p>The billing agent will be Network Energy Services who will manually read the electricity meters and issue bills to residents (customers) on a bi-monthly (2 month) basis, on behalf of Stockland Cardinal Freeman.</p> <p>Customers will receive a physical bill itemising the meter readings, usage and charges that relate to their metered electricity usage, along with a supply charge for their specific apartment. They can elect to receive invoices via email or mail.</p> <p>The current bill template for Cardinal Freeman The Residences can be found in Appendix K.</p>

Requirement	AER Guidance	Applicant's Response
<p>25. What dispute resolution procedures will the Applicant put in place to deal with energy related complaints and issues?</p> <p>Confirm that the policy is consistent with the Australian Standards AS/NZS 10002:2014 Customer Satisfaction – Guideline.</p>	<p>Provide a copy of the relevant policy.</p> <p>Provide confirmation that the Applicant will join an Ombudsman scheme if required in the applicant's circumstances.</p>	<p>Stockland's <i>Complaints Handling and Dispute Resolution Procedure for Embedded Network Customers</i> can be found attached as Appendix C.</p> <p>This procedure is based on the <i>Australian/New Zealand Standard Guidelines for complaint management in organisations 10002:2014</i>.</p> <p>Customer complaints and disputes will also be managed by Stockland in accordance with the <i>Privacy Act 1988 (Cth)</i> and the Australian Privacy Principles.</p> <p>Cardinal Freeman The Residences is already a member of the Energy and Water Ombudsman New South Wales.</p>

Requirement	AER Guidance	Applicant's Response
26. Further information (optional)		<p>We request that the following information be considered:</p> <ul style="list-style-type: none"> <li>• It is the residents residing in Seaview Heights and Glentworth House who have driven this Individual Exemption application; they wish to have the option of purchasing discounted electricity from Stockland.</li> <li>• The enthusiasm from Seaview Heights and Glentworth House residents was reflected in their response to the embedded network conversion consent forms, with all but one resident providing their consent. Only 7 of the 67 occupied apartments have not completed and returned the form, with some of these residents being in the process of transitioning away from the village. 88% of apartments have submitted forms providing their consent for the embedded network conversion.</li> <li>• Stockland Cardinal Freeman have recently been reviewed and improved their electricity rates / discounts for all Cardinal Freeman residents. The new rates are planned to become effective on 18 August 2021 (see Appendix J) – which is hoped to be close to the time that this section is retrofitted into the embedded network. The rates being offered to customers represent a discount 25.1% compared to the 2021-22 Default Market Offer (DMO) in the Ausgrid region for a home consuming 3,900 kWh. The new discounted rates are: <ul style="list-style-type: none"> <li>○ Usage Rate: \$0.2079 (inc GST)</li> <li>○ Supply Charge: \$0.6380 (inc GST)</li> </ul> </li> <li>• Information sessions have been arranged to assist resident understanding of the disclosures within the documentation.</li> <li>• These customers are in the unique situation whereby they socialise with residents in the existing embedded network section of the village. They are in direct contact with other exempt customers of Stockland Cardinal Freeman and are aware of the billing service provided by Network Energy Services.</li> <li>• Stockland Retirement Living is an ethical operator of retirement villages and an ethical Exempt Seller of electricity to residents in their villages that are structured as embedded networks. As such, Stockland have undertaken in this application to adopt measures that ensure that residents can exercise their right of choice to purchase off a licensed retailer without incurring any financial detriment. These measures are explained in the section relating to Migration of Detriment.</li> </ul>

**Section 3: Converting Embedded Networks (Retrofitting)**

Requirements	AER Guidance	Applicant's Response
<p><b>Provision of information to customers</b></p>		
<p>27. The Applicant must inform customers if it seeks to retrofit the site as an embedded network and that this will require metering changes.</p>	<p>Explain and provide evidence of:</p> <ul style="list-style-type: none"> <li>• The information provided to customers (including any advantages and disadvantages associated with the conversion); and</li> <li>• How and in what format the information was relayed to customers.</li> </ul> <p>Examples may include, but are not limited to, information leaflets, copies of presentations given to customers.</p>	<p>All residents have been issued with information to notify of the planned retrofit conversion of the Glentworth House and Seaview Heights sections of Cardinal Freeman The Residences.</p> <p>The provision of information included:</p> <ul style="list-style-type: none"> <li>• Residents notified of a presentation to be conducted in the Cardinal Freeman the Residents village newsletter (everyone receives) and flyer placed on noticeboards (Appendix E)</li> <li>• A resident presentation was conducted on site on 15 April 2021 (Appendix F), providing information and disclosures relating to the Embedded Network retrofit and Individual Exemption. Copies of the <i>AER Embedded Network Conversions (retrofits) - Exempt Sellers &amp; residential sites</i> information document were made available to residents within this meeting.</li> <li>• An information folder containing the following documentation and forms was delivered into all resident letterboxes on 16 April 2021: <ul style="list-style-type: none"> <li>○ <i>Form F – Embedded Network Conversion Information</i> (Appendix G)</li> <li>○ <i>Form G – Resident Consent for Network Agreement</i> (Appendix H)</li> <li>○ <i>Cardinal Freeman The Residences Welcome Pack</i> (Appendix I)</li> </ul> </li> <li>• A follow up Q&amp;A forum was hosted by village management for residents on 1 June 2021.</li> </ul> <p>The varied forms of communication with residents and the offer to answer further queries via telephone or email were greatly appreciated, especially from those who were blind and hearing impaired.</p>

Requirements	AER Guidance	Applicant's Response
<p>28. The Applicant must inform its customers that they retain the right to contract with a retailer of choice at any time, even if they have been included in the embedded network (except in jurisdictions where this right does not exist).</p>	<p>Provide evidence of the information provided to customers and how it was conveyed. The information should clearly highlight any negative consequences associated with joining an embedded network.</p>	<p>Residents were advised in writing of their right of choice to purchase off a licensed retailer of their choosing. This information and all relevant applicable disclosures are also explicitly outlined in the following documentation supplied:</p> <ul style="list-style-type: none"> <li>• Form F - Embedded Network Conversion Information (Appendix G)</li> <li>• Cardinal Freeman The Residences Welcome Pack - Form C Exempt Electricity Supply Disclosure Statement (Appendix I)</li> </ul> <p>Residents were verbally informed of their right of choice in the resident presentation held on 15 April 2021 (see Appendix F).</p> <p>Residents who attended this meeting also were provided the opportunity to receive a copy of the <i>AER Embedded Network Conversions (retrofits) – Exempt Sellers &amp; residential sites</i> document.</p>
<p>29. The Applicant must inform its customers 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.</p>	<p>Provide evidence that this information has been clearly explained to customers. This may include copies of materials given or presented to potential customers.</p>	<p>Residents were informed of the process to exercise their right of choice in the resident presentation held on 15 April 2021 (see Appendix F). This presentation included information on how customers may need to enter into an energy only contract with retailers should they choose not to purchase their electricity from Stockland. It was explained that this may not be an easy offer to obtain.</p> <p>Residents who attended this meeting also were provided the opportunity to receive a copy of the <i>AER Embedded Network Conversions (retrofits) – Exempt Sellers &amp; residential sites</i> document.</p> <p>This information and all relevant applicable disclosures are also explicitly outlined in the following documentation supplied:</p> <ul style="list-style-type: none"> <li>• Form F - Embedded Network Conversion Information (Appendix G)</li> <li>• Cardinal Freeman The Residences Welcome Pack - Form C Exempt Electricity Supply Disclosure Statement (Appendix I)</li> </ul>

Requirements	AER Guidance	Applicant's Response
<p>30. The Applicant must inform its customers that they may not receive the same protections as those of an authorised retailer under the Retail Law, including (but not limited to) access to Ombudsman schemes.</p>	<p>Provide evidence that this information has been clearly explained to customers. This may include copies of materials given or presented to potential customers.</p>	<p>Residents were informed that they may not receive the same protections as offered by a Licensed Retailer in the presentation held on 15 April 2021 (Appendix F).</p> <p>Residents who attended this meeting also were provided the opportunity to receive a copy of the <i>AER Embedded Network Conversions (retrofits) – Exempt Sellers &amp; residential sites</i> document.</p> <p>This information and all relevant applicable disclosures are also explicitly outlined in the following documentation supplied:</p> <ul style="list-style-type: none"> <li>• Form F - Embedded Network Conversion Information (Appendix G)</li> <li>• Cardinal Freeman The Residences Welcome Pack - Form C Exempt Electricity Supply Disclosure Statement (Appendix I)</li> </ul>
<p>31. The Applicant must provide consumers with a copy of its electricity sales agreement, detailing all fees and tariffs.</p>	<p>Provide a copy of the sales agreement sent to customers and confirm that customers received this information prior to providing consent to the retrofit.</p>	<p>The sale agreement is referred to as the <i>Cardinal Freeman The Residences Welcome Pack</i> (Appendix I) which was delivered to residents via their letterboxes on 16 April 2021. The Welcome Pack includes:</p> <ul style="list-style-type: none"> <li>• Form A – Discounted Electricity at Cardinal Freeman The Residences (which includes outlining the discounted tariffs being offered)</li> <li>• Form B – Exempt Electricity Supplier Agreement</li> <li>• Form C – Exempt Electricity Supply Disclosure Statement (including customer acknowledgement)</li> <li>• Form D – NSW Low Income Household Rebate (information)</li> <li>• Form E – Recurring Services Agreement (and Direct Debit Request Authority form)</li> </ul>
<p>32. The Applicant must provide customers with the contact details of the Applicant's representative to answer any queries or concerns about the planned retrofit.</p>	<p>Provide the document that contains this information.</p>	<p>The contact details for both Network Energy Services and the Village Manager of Cardinal Freeman The Residences is outlined in all key documentation supplied to residents, including:</p> <ul style="list-style-type: none"> <li>• Form F - Embedded Network Conversion Information (Appendix G)</li> <li>• Form G – Resident Consent for Network Agreement (Appendix H)</li> <li>• Cardinal Freeman The Residences Welcome Pack (Appendix I)</li> </ul>

Requirements	AER Guidance	Applicant's Response										
<b>Explicit Informed Consent</b>												
<p>33. The Applicant must confirm that it has evidence of written consent of all customers affected by the retrofit.</p>	<ul style="list-style-type: none"> <li>• Provide evidence of the consent document.</li> <li>• Confirm the percentage of consent given.</li> <li>• If there has been any dissent, explain the concerns raised and how these have been addressed.</li> <li>• Provide an example of a signed consent form.</li> </ul> <p>Note: evidentiary documents will need to be attached as an appendix to the checklist.</p>	<table border="1" data-bbox="976 321 1906 553"> <thead> <tr> <th>No. of customers at site</th> <th>No. of customers who provided consent</th> <th>No. of customers that refused consent</th> <th>No. of customers that have not responded</th> <th>% of consenting tenants</th> </tr> </thead> <tbody> <tr> <td>67</td> <td>59</td> <td>1</td> <td>7</td> <td>88%</td> </tr> </tbody> </table> <p><b>Consent Breakdown:</b></p> <p>All returned and signed Form G – Resident Consent for Network Agreement forms can be found in Appendix D.</p> <ul style="list-style-type: none"> <li>• Fifty-nine (59) residents provided consent.</li> <li>• Only one (1) resident returned a form refusing consent.</li> <li>• Seven (7) residents did not respond at all.</li> <li>• 88% consent was received.</li> </ul> <p>Of the residents who refused consent (1) or did not respond at all (7), none engaged in the presentations or forums, despite attempts being made to contact them. It is worth noting that all are elderly, and this matter is not of importance to them given their late stage in life, simply exercising their right to not provide their consent or to respond.</p> <p>Only seven (7) residents raised formal queries or concerns, all of which have been responded to and ultimately provided consent.</p> <p>The resident electricity tariffs planned to be introduced from 18 August 2021 are significantly better than any current price examples provided by residents for comparison.</p>	No. of customers at site	No. of customers who provided consent	No. of customers that refused consent	No. of customers that have not responded	% of consenting tenants	67	59	1	7	88%
No. of customers at site	No. of customers who provided consent	No. of customers that refused consent	No. of customers that have not responded	% of consenting tenants								
67	59	1	7	88%								
<p>34. The Applicant must confirm that consent to the retrofit was sought separately from consent to the sale of energy agreement.</p>	<p>Provide an explanation of when and how consent documents were provided to customers.</p>	<p>Yes, consent to the retrofit was sought separately from consent to the sale of energy agreement. Residents were asked to complete and return only Form G - Resident Consent for Network Agreement (Appendix H) by 30 April 2021.</p> <p>This requirement was reinforced in the resident presentation held on 15 April 2021 (Appendix F).</p>										

Requirements	AER Guidance	Applicant's Response
<p>35. The Applicant must provide documentation outlining any concerns raised by tenants, and evidence of the Applicant's attempts to address those concerns.</p>		<p>A number of queries were raised with the Village Management or Network Energy Services. The queries and responses were as follows and resulted in consent being received from each relevant resident:</p> <ul style="list-style-type: none"> <li>• Residents requesting price comparisons to assess the Stockland Cardinal Freeman rates to their own billed rates. Price comparisons were prepared and emailed / mailed back to these residents.</li> <li>• Power of Attorney for a resident asked questions related to the retrofit to clarify the situation as she was not present at the resident meeting. A price comparison was also sought. An explanation of the retrofit process was provided to the POA and price comparison also provided.</li> <li>• Sight impaired resident requested an electronic copy of the documentation and a sample of e-bill to check if their 'reader' technology could interpret the information. This was provided and the 'reader' technology was able to read the material and interpret the bill. An additional follow-up phone call was made and feedback was provided in relation to 'Right of Choice' and billing of network charges.</li> <li>• Raised queries surrounding metering, potential power outages and requested a price comparison. Reassurance was provided that there would be no meter costs for residents who joined the embedded network or chose to stay with their retailer. Feedback was provided on the power outages and the role of the networks. A bill analysis was provided.</li> <li>• Questions were posed about how they would go about purchasing electricity from another retailer if they were able to obtain better rates than Stockland in future. Feedback was provided on the process to access a retailer offer, and how the process would be supported. Clarification was given that Network Energy Services is the Embedded Network Manager (ENM) who would assist this process.</li> <li>• Sought clarity on what the network charges related to and whether Stockland would issue a separate invoice for these if they obtained an energy only contract from a retailer in future. Feedback was provided on the separate billing of network charges. References were made to Form C with the welcome pack which shows the shadow network charges that would be charged, in the event that the network charges were not billed by a licensed retailer.</li> <li>• Advised that as a loyal customer of a specific retailer for more than 30 years, they wished to continue purchasing from that retailer despite better pricing being offered by Stockland. We indicated that we would assist them remain a customer of their current retailer.</li> </ul>



Requirements	AER Guidance	Applicant's Response
<b>Retail Contestability</b>		
<p>36. The Applicant must confirm that it sought advice from the relevant distributor about whether non-consenting customers can be wired out of the embedded network.</p>	<p>Provide evidence of advice sought/received and details of wiring out options available.</p> <p>If wiring out is not being offered as an option, explain why not.</p>	<p>Wiring out is not being offered as an option due to the existing electrical configuration within the Cardinal Freeman The Residences site.</p> <p>Provisions for the retrofit conversion were made as part of the Stage 3 site development which included the construction of buildings referred to as 'Lily', 'Maple' and 'Camellia' as outlined in Appendix A. These three buildings are located within the greenfield section of the village.</p> <p>Provisions as part of the Stage 3 development (outlined above) were made in the Main Switchboard so that a parent meter could be installed to enable a future brownfield retrofit of Glentworth House and Seaview Heights, subject to an Individual Exemption being granted (a retrofit has not already been made).</p> <p>Information was sought from Ausgrid in relation to how on-market child's should be set-up and transitioned.</p>
<p>37. The Applicant must demonstrate the steps taken to ensure that customers who wish to remain with their current retailer, but cannot be wired out, will not be financially disadvantaged by the retrofit.</p>	<p>Provide evidence of this.</p> <p>Include measures to reduce financial detriment e.g. price matching for affected customers, and taking financial responsibility for any double billing of network charges.</p>	<p>As outlined in Form F - Embedded Network Conversion Information (Appendix G), it covers off:</p> <ul style="list-style-type: none"> <li>• Right of Choice</li> <li>• Steps to take if they wish to purchase energy from someone other than Stockland</li> <li>• Price matching</li> </ul> <p>The presentation to residents on 15 April 2021 also covered off that no resident would be financially disadvantaged by the retrofit should they wish to purchase electricity from anyone else other than Stockland.</p>

Requirements	AER Guidance	Applicant's Response
<b>Customer Dispute Resolutions Services</b>		
<p>38. The Applicant must advise customers of its dispute resolution process and the options available for external dispute resolution (including access to ombudsman schemes).</p>	<p>Provide the documents and confirm that they were provided to customers.</p> <p>For individual exemptions involving retrofits, we will assess the need for ombudsman scheme access and impose relevant conditions on a case-by-case basis.</p>	<p>Stockland's <i>Complaints Handling and Dispute Resolution Procedure for Embedded Network Customers</i> was included in the folder of information supplied to residents and can be found attached as Appendix C.</p> <p>Cardinal Freeman The Residences is already a member of the Energy and Water Ombudsman New South Wales (EWON).</p>
<b>AER Consultation</b>		
<p>39. The Applicant must confirm that it has advised consumers of the AER's consultation process, including that:</p> <ul style="list-style-type: none"> <li>• the AER consults on these types of applications</li> <li>• the application will be published on the AER website, and</li> <li>• the AER will accept public submissions</li> <li>• the consultation period will be open for 20 business days.</li> </ul>		<p>Residents were informed of the AER's consultation process in the resident presentation held on 15 April 2021 (see Appendix F).</p> <p>Reference to the AER process is also made in the following documentation supplied to all residents:</p> <ul style="list-style-type: none"> <li>• Form F - Embedded Network Conversion Information (Appendix G), which includes a link to the Network Service Provider Registration Exemption Guideline March 2018</li> </ul> <p>Residents have since also received a further communication dated 6 July 2021 to confirm that the AER Submission has since been lodged and reinforced the AER's consultation process as was referenced in Form F which can be found in Appendix L.</p>

Requirements	AER Guidance	Applicant's Response
<b>Additional retrofit mitigation information</b>		
<p>Provide any further information regarding to the steps taken to mitigate the detriment to customers associated with the creation of an embedded network. (optional)</p>		<p>Network Energy Services (Embedded Network Manager) has consulted with the distributor Ausgrid to clarify the process for customers choosing to remain with their current licensed retailer.</p> <p>The process will involve;</p> <ul style="list-style-type: none"> <li>• Consumers indicate their intention to remain with their existing electricity retailer.</li> <li>• AEMO will issue Child NMIs to Network Energy Services as the ENM. Network Energy Services will allocate the 'Child' NMIs to on-market childs.</li> <li>• Network Energy Services will liaise with their retailer to request that the electricity meters on the homes of on-market childs be upgraded to a smart meter. Ausgrid have confirmed that they unable to be involved in any metering upgrades due to regulatory ring-fencing issues.</li> <li>• Network Energy Services will liaise with the parent meter retailer so that the consumption from the On-market child is subtracted away from the parent meter.</li> <li>• Residents have been informed that they will not incur any costs for meter upgrades or changes that may be required.</li> <li>• Customers cannot be wired out of the embedded network due to the electrical layout of a multi-story building however this does not in any way inhibit the ability of a resident to access to licensed retailers</li> </ul>