



Victorian Caravan Parks Association Inc.

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7 March 2011

Response to the Consultation Paper December 2010

The Victorian Caravan Parks Association appreciates the opportunity to respond to this paper.

We attach in support of our response a copy of the initial response forwarded from this office in July 2010. No argument in the December 2010 Papers has persuaded us to alter these views, and they are worth re-visiting.

In addition, we enclose our response to the document seeking our views on the specific proposal and Proposed Conditions for Class R4 category persons to require that REGISTRABLE EXEMPTION (CLASS R4) should apply to persons on-selling metered energy to residents for use in premises within the limits of a caravan park, residential park or manufactured home estate site that they own, occupy or operate, where the premises are the principal place of residence for the resident.

In summary:

- The proposed Retailer authorisations are not practical for Class R4 and D3. Park operators provide both supply and usage facilities to park residents as a service, and not as a business, and should not be burdened with further compliance requirements to provide this service.
- Park operators meet all costs associated with installation and maintenance of supply, and provide the additional benefits to customers of immediate supply, no connection fees and no formal process to set up the supply. Many park residents are welfare recipients, elderly, or in need of emergency accommodation. They are not able to offer bonds to cover costs of supply and use, as surety for the caravan park operator.
- There are adequate compliance requirements already in place to protect customers, cap prices that residents can be charged for supply and usage, and to manage issues of billing, payment and dispute resolution.
- A requirement to offer residents a choice of electricity retailer would impose an unfair burden of administration on park operators who are providing this service, and may force

them to reconsider the benefits of requiring residents to make their own arrangements with the various companies, or to replace metered charging with a blanket increase in general site fees, thereby removing incentives to conserve energy.

- Eligible residents have access to concessional treatment of electricity costs and are therefore not disadvantaged .

Please contact Elizabeth White on (03) 9328 3280 if you wish to discuss any of the issues raised in this submission further.

Yours sincerely

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