

edgewater

lake kawana | sunshine coast



Application to the Australian Energy Regulator (AER) for an Individual Exemption (Embedded Network)

Part 1: General Information Requirements

- 1. Legal Name:** The Body Corporate for Edgewater Lake Kawana CTS 43881
- 2. Trading Name (if applicable):** Not applicable
- 3. ABN/ACN:** 44 362 029 382
- 4. Registered Postal Address:** 21 Innovation Parkway, Birtinya QLD 4575
- 5. Nominated Contact Person:** Mr Grant Mifsud
Position: Partner, Archers Body Corporate Management
Role: Body Corporate Manager for this site
Phone: 07 5458 4515
Mobile: 0458 272 525
Email: Grant.Mifsud@abcm.com.au

6. Reason for Individual Exemption:

The Body Corporate for Edgewater Lake Kawana (**Body Corporate**) aims to establish a more cost effective electricity supply arrangement for the residents of Edgewater Lake Kawana that delivers greater savings over traditional individual electricity supply arrangements for all residents, as well as providing the structure to facilitate further energy savings in the future for the community.

The Body Corporate have been investigating the potential for implementation of an embedded network since 2014 (see attachments) and have considered using an authorised retailer, however the Body Corporate has completed an independent evaluation which has determined that the lowest possible electricity costs for the residents is through a Body Corporate managed arrangement under a retail exemption.

The on-selling of electricity is not a core business of the Body Corporate and they will engage a suitably qualified Billing Agent to ensure all conditions of the applicable exemption will be met.

Throughout the entire consultation process with the community, residents have been well informed of their choice and the Body Corporate intends to allow the freedom of choice for all residents both prior to implementation (through wire outs) and post implementation (through opt outs under the Power of Choice or future wire outs).

7. Address of Site in the Application:

21 Innovation Parkway, Birtinya QLD 4575



8. Primary Activity and Site Description:

Edgewater Lake Kawana is a Residential Body Corporate complex consisting of three separate towers. The site is for residential accommodation only with owner occupiers and long term

tenants. No short term holiday letting occurs in this property – i.e. it does not operate like a hotel. It is not anticipated that the use will change at any time in the future.

9. Form of Utility for which Individual exemption is sought:

Electricity only.

The supply of electricity will be sourced from a licenced retailer, via a direct connection to the existing electricity network.

There is no intent to sell any other utility with each apartment having their own individual hot water supply and no gas connected to the site.

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

No.

However, the Body Corporate is aiming to establish a more appropriate electricity supply arrangement to the site that is more reflective of the true cost of supply to the site and to deliver significantly lower electricity supply costs for residents than otherwise achievable through any traditional electricity retailer.

Currently, individual retailers (and the local network company) are using privately owned infrastructure to supply electricity to all residents at this site.

11. Date of which you intend to commence selling of utility:

As soon as possible, subject to:

- the approval of the AER and,
- the subsequent approval of the conversion to an embedded network, in accordance with the AER's conditions of approval, by the Body Corporate at a General Meeting proposed for October 2019.

The Body Corporate acknowledges there is a process that the AER needs to undertake to address all relevant issues and that, that process can take up to 12 weeks.

12. Mailing address for premises at the site: (The AER may use this information to ensure that potential customers are able to participate in their consultation process)

C/- Archers Body Corporate Management
PO Box 1191
Mooloolaba QLD 4557

13. Details of any experience in selling energy:

The Body Corporate itself has not had experience in the on-selling of electricity but, it has engaged and, will continue to engage appropriate professional parties with relevant experience to properly advise the Body Corporate and to assist with the implementation and ongoing billing arrangements.

In particular, the Body Corporate has engaged ARC Utilities (**ARC**) as its nominated billing agent to perform the duties associated with the on-supply of electricity to the residents.

ARC operates a number of similar building complexes with embedded networks and has the professional capabilities, experience, policies, procedures and systems in place to ensure that the services delivered to the residents are managed properly and, in accordance with the AER guidelines.

ARC will manage all aspects of the meter reading, billing, debt management, customer management services and complaints handling and/or dispute resolution processes that may arise, from time to time.

The Body Corporate will be the on-seller and ARC will act only as the billing agent. The energy contract will be with the Body Corporate and it will bear the total financial risk associated with the on-selling of energy to the residents. The Body Corporate committee will also oversee the on-selling process and, make specific responsible/commercial decisions, as and where required.

ARC are also in the process of obtaining an off-market retailer authorisation to be able to comply with proposed future changes in embedded networks.

14. Do 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:

Not relevant to this application.

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).

The Body Corporate will ensure that all existing infrastructure can facilitate the “unbundling” of the embedded network and create individual NMIs for each resident user, if required. This will require no additional infrastructure work and could be established at relatively low cost for each resident, no different to establishing a new connection for an individual residence.

A further contingency (as a last resort), and in the event the Body Corporate can no longer continue supplying energy, the Body Corporate would approach an existing authorised retailer providing these services, to take over the operation and management of the embedded network.

The Body Corporate has also considered in the engagement of ARC, that ARC has the future intention to become an “off market” retailer should the latest AEMC recommendation be adopted and could provide a seamless transition in the event the Body Corporate is no longer able to supply energy to the residents.

The Body Corporate is currently supplied by Origin Energy for its community supply and, it sees no change to the supply for the proposed embedded network, at this stage.

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?

All customers will either be resident owners (owner occupiers) or tenants and all are solely residential in nature. There are no commercial or retail lots in the complex.

All tenants, with or without an appropriate lease, are governed under the Residential Tenancy Act (Qld), in matters relating to the lease or rental arrangements.

Both resident owners and tenants are also bound by the Body Corporate by-laws for the property, under the Body Corporate and Community Management Act (Qld).

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 intention of the Body Corporate is to supply and on-sell electricity only, as a service.

The Body Corporate does not have any other commercial arrangements or relationships. Any lease arrangements (i.e. for residential tenancies) are through property/leasing agents.

There are no other utilities on site that will be on-supplied (i.e. no hot water or gas).

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 Edgewater Lake Kawana building complex comprises 140 residential apartments and, the community or common area supply.

All apartments are classified as small market customers.

The Body Corporate community supply is currently a large customer, although the Body Corporate would not be selling to itself under the proposed embedded network arrangement.

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 Body Corporate will only be on-selling energy that is purchased from an authorised retailer.

The Body Corporate is currently supplied by Origin Energy and at the time of the conversion would enter into a 12 month agreement with Origin Energy.

After that time, the Body Corporate will conduct a competitive tender process to source the most efficient and cost effective supply from a suitable retailer operating in QLD. The term of any new supply contract will be for at least 12 months and, any longer term contracts that may be entered into will be subject to the market rates and conditions at that time.

Typically, the Body Corporate will endeavour to enter into a three year contract, where appropriate. Also, in most cases, the Body Corporate will engage a professional consultant or broker to assist with the process and, provide the necessary due diligence and advice required under the Body Corporate and Community Management Act (QLD).

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)?

The current estimated aggregate consumption is approximately 800 MWh per annum.

The current usage is broken into 187 MWh for the community areas and, approximately 613 MWh for the residential apartments.

The average residential apartment is expected to use approximately 4,400 kWh per annum for their general power plus hot water (instantaneous heaters). This information was based on independent meter reads and sample accounts provided through the assessment, due diligence and feasibility process conducted by the Body Corporate.

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 may be taken to 'operate' premises it oversees).

All customers reside within the boundaries of the property that forms the Body Corporate – i.e. three multi-storey high rise buildings in a residential complex.

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 – all customers 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?

The Body Corporate will replace all existing meters with NEM compliant remotely read smart meters to facilitate access to meter data for all residents, as well as facilitate future access to competitive offers from other retailers under the Power of Choice.

The preference will be to lease or rent the meters from an authorised Meter Provider (i.e. Metering Dynamics, Plus_ES, Powermetrics, etc) to ensure the meters are kept to an appropriate standard and accuracy.

The meters will be remotely read but also programmed to allow for face reading.

The Body Corporate will enter into an agreement for the meter reading services. Under this agreement the meters are typically read daily in line with NEM metering requirements, however generally monthly data will be used to create the accounts.

The existing community meter currently has a market meter and will be retained to meter the common areas only after the proposed conversion. This will also be replaced with a NEM compliant market meter to enable the reconciliation of all electricity used in the property.

A totally new parent meter will be installed separately upstream of the existing community meter and individual apartment meters. This way the Body Corporate can reconcile usage for the whole site, plus also allows an easy transition to a retail managed arrangement in the future.

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

Customers (residents) will receive individual electricity accounts issued by the Billing Agent on behalf of the Body Corporate.

The accounts can be issued as hard copy and posted or delivered to the customers, or electronically as requested by the customers.

Accounts will be issued by ARC or another contracted Billing Agent.

Accounts will be issued at regular cycles on either a quarterly, bi-monthly or monthly intervals. The cycle will be determined by the Body Corporate but, with consideration of the wishes of the majority of residents. If there is any dispute then, the default will be quarterly billing.

The maximum billing period regardless will be quarterly or approximately 90 days.

25. What dispute resolution procedures do you intend to put in place to deal with energy related complaints and issues?

The dispute resolution process will be managed by ARC Utilities as the Billing Agent and will be in accordance with AER requirements, as set out under the AER guidelines and the expected relevant AER approval conditions.

ARC has in place across all of its serviced buildings appropriate Complaints Handling and Dispute Resolution policies, procedures and systems, in accordance with the AER guidelines and requirements.

ARC would normally be the first point of call for any dispute, and where possible, it will work promptly and co-operatively with the customer to resolve the dispute internally.

Where a dispute cannot be resolved, provision exists for dispute resolution by independent mediators.

ARC provides flexible payment options (including non-internet based options), applies rebates to applicable customers, and facilitates access to hardship arrangements, Home Energy Emergency Assistance Scheme (HEEAS).

A copy of the current dispute resolution process from ARC is attached for reference.

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

- **Rebates and Concessions**

All residents will have access to the **QLD Electricity Rebate** applicable to eligible seniors, pensioners, veteran affairs and other eligible persons, in accordance with QLD Government requirements.

In addition, ARC will also facilitate access to hardship arrangements available from the QLD Government **Home Energy Emergency Assistance Scheme** for eligible persons.

ARC applies and lodges all rebate applications on behalf of the Body Corporate and liaises with the retailer of the embedded network for the relevant rebates.

In all cases, the Body Corporate will apply the rebate to the approved residents and then, recover the bulk rebates via their retailer via ARC.

- **Solar and Energy Efficiency**

The Body Corporate will facilitate wherever possible access to energy efficiency options for the resident including access to green energy and solar where allowed under the Body Corporate by-laws.

In most high rise building there is limited roof space to install solar and the majority of residents, if not all, do not have access to the roof area to install solar.

The roof on most high rise residential building is common area. Also with limited roof space to be allotted to each individual apartment owner or resident, the space available may be limiting.

As a result the Body Corporate has considered more broadly a community based solar installation that will benefit both the Body Corporate (for common areas) and residents. Under an embedded network a larger system can be installed without the need for complex metering.

If there are any owners who have roof access and wish to install solar, the Body Corporate would consider net metering.

- **Other General Information**

As previously mentioned, the primary objective and purpose of the proposed embedded network is to deliver significantly lower electricity costs to residents in the building. Consideration will always be taken to ensure that no resident is worse off and, that they will always receive electricity at a lower cost than any retailer would be able to supply to an individual customer.

It must also be noted that under the Body Corporate legislation in QLD, a Body Corporate cannot profit from the provision of any service and therefore, the maximum savings will always be passed on to the residents. This is in stark contrast to licenced retailers, who provide similar services in these circumstances, where they will always have some additional profit margin built into their offers and pricing.

The Body Corporate will proactively ensure that the way it purchases the electricity for the bulk supply, will continue to deliver savings to the residents.

In terms of safety, as the owner of the property, the Body Corporate has always had responsibility for the safety, reliability and security for the supply of electricity to the residents within the building. The supply authority has only had responsibility for the supply to the connection point at the building and thereafter, the Body Corporate is responsible for all infrastructure within the building, regardless of whether the site has a "retail" embedded network set up or not.

An embedded network owned and operated by a Body Corporate under the current rules in Queensland provides the greatest benefit to any resident in terms of price and all other conditions, apart from the freedom of choice. The resident's freedom of choice will not see any resident disadvantaged or receive lower electricity prices, regardless of any future competition arrangement, simply by the way the savings are derived under an embedded network.

The Body Corporate would also like the AER to consider that licenced retailers, who implement embedded networks, do not need to apply for an individual exemption. They are however, still constrained in the same way as the Body Corporate in that, the physical nature of the embedded network means no customer can easily "opt out" other than by rewiring the meter, outside of the gate meter.

While retailers may purport to provide a higher level of consumer protection, their customers have no more of a choice than any Body Corporate that operates an embedded network.

Please note that the Body Corporate's proposed embedded network is not driven by profit. So, it will always deliver better outcomes for residents, of course, subject to all other aspects of supply being well managed.

In addition, the Body Corporate will engage professional billing agents and other consultants as required, to ensure that the embedded network is properly and professionally managed, in an efficient and cost effective way, for the benefit of all customers in the building.

Part 3: Converting Embedded Networks (retrofitting)

Please refer to the following for evidence that consumers have been provided with the following information:

27. Information has been provided to residents that the Body Corporate is planning to retrofit the site as an embedded network and this will require metering changes

Please refer to attached information.

28. Information has been provided to residents 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)

Please refer to attached information.

29. Information has been provided to residents 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

Please refer to attached information.

30. Information has been provided to residents 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.

Please refer to attached information.

31. A copy the electricity sales agreement, which details all fees and tariffs has been provide to all residents

Please refer to sample attached.

32. Information has been provided to residents on the contact details of a representative from the Body Corporate to answer any queries or concerns about the planned retrofit.

Contact details that were provided are as follows.

Your contact: **Tony Brook**

Resident Manager

Phone: (07) 5437 6169

Mob: 0448 008 801

Email: rentals@edgewaterrealty.com.au

Alternative contact: **Andrew McNair**

Body Corporate Consultant

Energy Options Australia

Mob: 0448 008 801

Email: andrew@energyoptionsaustralia.com.au

33. Confirm you have evidence of written consent from all customers affected by the retrofit

Explicit informed consent has been sought and received from all residents.

Currently received 121 forms with one resident opting out. The remaining residents have indicated their acceptance but awaiting their signed forms.

Any residents who do not provide their consent will be “wired out” of the embedded network and retain a direct connection to the network with their current retailer of choice.

Breakdown of consents to date as follows:

- The number of consents received - 123 consents received
- The number of those yet to respond - 15 residents have not responded, with the residents either away or in the process of changing their tenancy
- The number of those specifically withholding consent - 2 residents has specifically withheld their consent, one in person to the Body Corporate and the other verbally
- The total consent of consent percentage obtained - 88%

34. Confirm that consent was sought separately from customers for the retrofit and the energy sale agreement

Explicit informed consent has been sought and received from all residents separate to the energy sale agreements.

The Body Corporate has initially focussed on obtaining the explicit informed consent to obtain approval from the AER to proceed.

Please refer to attached samples.

35. If customers have expressed concerns, provide evidence of your attempts to resolve them.

Please refer to attachments.

An open customer forum was held on Saturday 11th May where residents were invited to attend to ask any questions.

Approximately 20 residents attended representing 15 apartments.

The forum was held at the end of the second week of the consent process. This was considered to provide residents with some time to review the initial documentation, from which they could form valid questions.

Representatives Archers Body Corporate Management, ARC Utilities and Energy Options Australia were on hand to give an initial overview, plus specific responsibilities each party had in this process. After approximately 30 minutes of presentation, it was open to questions from the residents.

It must be noted that one resident who declined consent also attended the meeting to vocalise their non-consent and to be absolutely sure that they could in fact be excluded physically from the embedded networks. This reassurance was given and accepted.

A number of questions related to pensioner rebates and seeking a general understanding of the process.

Copies of all information and documentation were also available for any resident not able to receive electronically.

Concerns were addressed at the meeting with some questions followed up to residents through the Body Corporate committee.

36. Confirm advice has been sought from the distributor about whether non-consenting customers can be wired out of the embedded network

Advice has been previously sought from the distributor on the works required to “wire out” non-consenting customers. The distributor provides a process to wire out and resident where their meter is relocated to the same location as the new parent meter.

Currently there is only one resident who has confirmed to be wired out. Any further residents wanting to opt out will also be wired out if required.

The Body Corporate has sought separate quotes for these works. Any works will be at the Body Corporate expense.

37. Confirm steps taken 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.

Not relevant – for the initial conversion. Any customer wanting to remain with their current retailer will be “wired out”.

In the event a new resident (customer) to the site post conversion who does not wish to be part of the embedded network, the Body Corporate will facilitate their right to opt out under the current Power of Choice arrangements. In the event they cannot enter into an energy only arrangement (i.e. where no retailer is able to provide this type of offer), and until such time that the AER introduced proposed changes to the current process, the Body Corporate will ensure this customer is not financially disadvantaged and will offer price matching of any valid offer.

Where a resident is able to access an energy only arrangement, the Body Corporate will provide the best endeavours (i.e. where they have been provided evidence of the billing to the customer by their retailer of choice) to ensure the customers are not billed twice for any network charges.

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

Yes, refer to attachments.

39. 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 Body Corporate acknowledges the public consultation process that is required by the AER.

The Body Corporate will inform residents that this application for individual exemption will be open to public comment on the AER website.

Following advice from the AER, when the application has been accepted and subsequently published for consultation, the Body Corporate will advise all residents (owners or tenants), that the application has been published for consultation and, when the consultation period ends.

Sample public consultation and conversion notices are attached for reference.

Efforts to obtain explicit informed consent:

The Body Corporate began the process of converting to an embedded network initially in 2014. A consultative approach was undertaken by the Body Corporate Committee, the Body Corporate Managers (Archers Body Corporate Management), their resident building managers and more recently their consultant (Energy Options Australia).

Throughout this time the Body Corporate provided a number of information notices, updates and materials to inform the residents about bulk electricity supply and the embedded network, the conversion process, the benefits and savings associated with bulk electricity supply, eligible Queensland Rebates under an embedded network, and relevant background information, such as Frequently Asked Questions/Answers.

The Body Corporate also reviewed offers from a number of authorised retailers and Billing Agent earlier in the process, with a number of issues resulting in little or no progress.

In late 2018, with further impacts the cost of electricity for residents, the Body Corporate decided to revise the potential arrangements and made a decision between accepting an authorised retailer offer and implementing the embedded network under an individual exemption for the Body Corporate.

The savings achievable under a Body Corporate managed arrangement were too compelling (in excess of 14% greater than the retailer) and the Body Corporate voted to continue with the implantation of the embedded network and to seek an individual exemption.

The Body Corporate Committee provided an Information Forum, along with some general information sessions at meeting, to ask questions about the conversion to an embedded network and bulk electricity supply.

Information packs were provided to all residents including the explicit informed consent, general information about the proposed embedded network, a copy of the electricity supply agreement and some frequently asked questions.

Where a one-on-one approach was required, the Body Corporate Resident Manager (Mr Tony Brook) and Body Corporate Committee members and the Body Corporate consultants provided their time to discuss and address any questions or concerns raised by residents.

A sample copy of the original application form (the informed consent) and the terms and conditions provided to residents are attached for reference.

Throughout this entire information sharing and consultation process, ANY resident not wishing to participate was provided with the option to be "wired out" and, retain a separate connection that allowed them to continue with the existing arrangements, with their retailer of choice.

Other supporting documents including informative updates, conversion notices during the AER public comment process and other follow up letters in the lead up to the conversion date will be provided to residents in due course.

A sample conversion notice is attached for reference.

Other points under Network Exemption Guideline - Section 4.9 Conversion of an existing site

Other points noted under this section:

- **Record of which tenants/residents have not consented and their reasons for non-consent.**

Please refer to the attached copy of **Bulk Electricity Consent v3** spreadsheet. No specific reasons were given by either party other than did not want to participate. They were otherwise happy for the conversion to proceed for all other residents.

- **Record of the outcome of any negotiations and/or dispute resolution with tenants/residents.**

There were no specific negotiations or disputes to record. Note any comments for residents on the attached copy of **Bulk Electricity Consent v3** spreadsheet.

- **Views of customers both accepting and refusing to accept the conversion.**

Most customers were happy to accept the savings presented. The residents who declined to provide consent were not against the conversion in principal, they just chose not to be part.

- **Efforts sought to engage with prospective customers who do not consent and sought to mitigate their concerns?**

Apart from the two residents who declined, the literature and answering questions at the Body Corporate forum in May appeared to mitigate any concerns raised. Most common questions were around the ability to continue to receive the pensioner rebates.

- **Network exemption classes to be registered**

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- **The Body Corporate also undertakes to observe conditions 4.9.1 to 4.9.6 of the Network Exemption Guideline**

Attachments:

The following sample information and documents have been provided to all resident “users” of electricity in the Edgewater Lake Kawana complex. These documents are confidential and not for public.

- **Residents Letter** – Embedded Network Conversion Letter v1 (not for Public)
- **Explicit Informed Consent Document** (not for Public)
- **Frequently Asked Questions** (not for Public)
- **Edgewater 1 Page Flyer** (not for Public)
- **Edgewater Forum Flyer** – notice of public forum (not for Public)
- **Embedded Network Conversion Update** – update for residents provided in November 2019 (not for public)
- **Sample Application Form** – Sample application form from ARC Utilities, subject to approval of their engagement at the Body Corporate AGM (not for Public)
- **Dispute Resolution Process** – this is a copy of the ARC dispute resolution process on how the billing agent will manage any complaint or dispute, until such time as there is a State appointed Ombudsman accessible to on-suppliers such as the Body Corporate (not for Public)
- **AER Application - Submission Notice** – this is a copy of a notice that will be provided to residents informing them of the AER application process. (not for Public)
- **Edgewater Lake Kawana Bulk Electricity Supply - AER Public Consultation** – this is a copy of the follow up notice that will be provided to residents informing them of the acceptance of the application and the publishing of same on the AER website, that the application is open for comment, and the date that any submission must be received by the AER. (not for Public)
- **Conversion Notice to Residents** – if the application is successful and the conversion proceeds, this is a copy of a typical letter that would be sent to residents informing them of the physical changeover and the subsequent power outage. (not for Public)
- **Additional Documents regarding the due diligence and investigations carried out by the Body Corporate** – some sample of the previous investigations and reviews carried out by the Body Corporate to determine the best approach for the implementation of the embedded network including –
 - **Initial proposal form Energy Options Australia in 2014** – did not proceed at the time (not for Public)
 - **Review carried out by Empower Energy Consulting 2015** – reviewing proposals from a number of billing agents and a retailer (not for Public)
 - **Review of Billing Agent agreement by Clark Kann Lawyers 2016** – legal review of billing agent proposal prior to any decision on acceptance by the Body Corporate, did not proceed (not for Public)
 - **Review of Energy Options Australia 2018** – a further review by the Body corporate to make a final decision on whether to proceed under a retailer or Body corporate managed model (not for Public)