

30 July 2021

Australian Energy Regulator
Email: AERExemptions@aer.gov.au

RE: Application for Individual Exemption for Uniting Bowden Brae Normanhurst retirement village

Bowden Brae Normanhurst is a Uniting (NSW.ACT) owned and operated retirement village that is growing as part of a redevelopment.

Stage 1 of the Bowden Brae community has been completed, comprising of 39 apartments. Stage 2 of the development is currently under construction that will eventually result in a total of 140 residential retirement living apartments within the community plus common area facilities.

Bowden Brae Normanhurst is a single retirement community that will eventually comprise multiple apartment buildings. The plan is for the community to receive discounted electricity rates on their bills, but also benefit from lower common area electricity costs which assists in reducing their monthly levies. Residents are the primary beneficiaries of the embedded network at Bowden Brae Normanhurst, helping to lower the cost of living for retirees.

Stage 1 of the redevelopment includes 35 residents who are currently purchasing their electricity from licensed retailers.

The response from the residents of Stage 1 of Bowden Brae has been in support of providing their consent for the embedded network conversion, with 88.57% of current residents providing their consent for the embedded network conversion to proceed.

Uniting (NSW.ACT) is an experienced Embedded Network Owner / Operator with a strong focus on compliance to electricity rules and guidelines that govern exempt selling and exempt network operations. The documentation and information provided to Bowden Brae residents has sought to ensure that residents have a clear understanding of the differences with becoming an exempt customer within an embedded network.

Uniting (NSW.ACT) has prepared this Individual Exemption application in consultation with Network Energy Services (ENM). Network Energy Services is the designated point of contact to assist residents with the documentation and all related queries. Uniting (NSW.ACT) recognises that consumer protections and disclosure of information are at the core of the AER's exemption guidelines. These philosophies are shared by Uniting as will be demonstrated in this application.



Kind Regards,

Keith Morgan

Head of Village Services

Uniting

[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>	Uniting (NSW.ACT)
2. Trading name (if different to legal name).		Uniting (NSW.ACT)
3. ABN or ACN.	<p>Use the ABN Lookup online search to check that the ABN matches the legal name you have provided.</p> <p>Use the ASIC Connect website to check that the ACN matches the legal name you have provided.</p>	ABN: 78 722 539 923
4. Registered postal address for correspondence.		10 / 222 Pitt Street, Sydney NSW 2000

Requirement	AER Guidance	Applicant's Response
5. Nominated contact person, their position and contact details.		<p>Damian Arsenis General Manager Network Energy Services PO Box 2296 MOUNT WAVERLEY VIC 3149 Phone: 03 9807 5286 Email: damian@networkenergy.com.au</p> <p>Ross Buchanan Village Manager Uniting Bowden Brae 9 Frith Avenue NORMANHURST NSW 2076 Phone: 02 9483 9027 Email: rbuchanan@uniting.org</p>
6. Reasons for seeking an individual exemption (rather than an authorisation).	See: Section 3 of the Retail Exempt Selling Guideline .	<p>Uniting is seeking an individual exemption for its Bowden Brae retirement village in Normanhurst. Uniting's core business is owning and operating retirement villages and aged care facilities. The on-selling of electricity is incidental to their core business.</p> <p>Uniting Bowden Brae is a retirement village under redevelopment, where only one stage (39 apartments) has been completed. Since the residents who have moved into these 39 apartments are already grid connected with a licensed retailer then an Individual Exemption is needed. The second stage of the retirement village is currently under development. Once completed, there will be a total of 140 apartments in Uniting Bowden Brae retirement village. If the Individual Exemption is successful, then the new residents moving into the second stage of the village will have the option of purchasing their electricity off Uniting.</p>
7. Site address and description of current and future use/s.	Also attach a site map as an appendix to this checklist.	<p>Site Address: 9 Frith Avenue, Normanhurst NSW 2076</p> <p>Description of Use: Retirement Village</p> <p>Site map submitted with application? Yes (Appendix A)</p>

Requirement	AER Guidance	Applicant's Response
8. Primary activity of the Applicant's business.	<p>Examples may include but are not limited to:</p> <ul style="list-style-type: none"> • caravan park operator: provision of accommodation • body corporate: management of common property <p>See also Section 2 below.</p>	<p>The primary business of Uniting's retirement living division is through owning and operating retirement villages. Bowden Brae is just one of their retirement villages as part of a significant portfolio of locations (31) across Australia.</p>
9. Form of energy for which the Applicant is seeking an individual exemption.	<p>For electricity, state whether the network through which the Applicant proposes to sell is either directly or indirectly connected to the main grid OR is/will be an off grid network.</p>	<p>The individual exemption is requested for the sale of electricity within its Bowden Brae retirement village, which is proposed to be converted into an embedded network and be directly connected to the grid via a single parent meter.</p>
10. Is the Applicant establishing, or have they established, energy supply in an area where there are no other viable energy supply arrangements available?	<p>If not, please provide examples of how customers will be able to access alternatives, should they choose to utilise their power of choice.</p>	<p>No. The Bowden Brae buildings contain apartments which are currently all individually connected directly to the grid.</p>
11. Proposed commencement date for the sale of energy.		<p>The planned date is 27 January 2021 subject to AER approval</p>
12. Mailing address for site correspondence.		<p>9 Frith Avenue, Normanhurst NSW 2076</p>

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"> • Date/s and locations of previous operations • Form/s of energy sold • Scale of operations (that is, the number, size and type of customers) • An explanation of activities to be conducted by the Applicant and what activities will be contracted out to third parties. 	<p>Uniting's retirement living division is currently the exempt seller of electricity in 3 existing retirement villages and almost 500 customers (residents) across New South Wales.</p> <p>The details of each of these embedded networks are contained within Appendix B.</p> <p>Uniting is responsible for the parent meter electricity supply contracts and also the payment of the parent meter bills.</p> <p>Uniting has engaged Network Energy Services to provide the following services for the management of the Bowden Brae embedded network:</p> <ul style="list-style-type: none"> • Facilitate the retrofit of the Bowden Brae retirement living, including the provision and facilitation of all required resident communications and documentation. • 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. • Embedded Network Manager function
<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>Uniting's retirement living division currently holds AER Network Exemptions for 3 retirement village sites (NR3). They also have AER Retail Exemption (R3) for all 3 sites located in NSW.</p> <p>Neither Uniting 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 Uniting could no longer continue supplying the electricity to residents at Bowden Brae, Uniting and Network Energy Services (ENM) will assist customers to transition to an electricity retailer of their choice.</p> <ul style="list-style-type: none"> • The electricity meters that are being installed across the village are all Automated Meter Reading (AMR) meters from accredited Meter Providers (MPs) and Meter Data Providers (MDPs), which will allow the electricity meters to be used by the Exempt Seller (Uniting) or licensed retailers. <p>The metering within stage 1 of Bowden Brae is currently provided by Vector as the Meter Provider, and all are EDMI Atlas Mk7c. These meters will remain for consumers continuing to purchase off their current retailers.</p> <p>For customer purchasing off Uniting, and Stage Two apartments, AMR electricity meters will be installed by PlusES who is also an accredited MP and MDP. The meters to be installed are Secure Liberty Single Phase Meters. This metering option will allow licenced retailers to use these meters if the Exempt Seller were to cease on-selling electricity.</p> <ul style="list-style-type: none"> • Uniting undertake to incur any necessary metering costs and take whatever action is required to facilitate resident access to retailers in the event that Uniting discontinued electricity on-selling. • 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.

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>OR 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, Uniting provides many services to residents within the village, primarily relating to retirement accommodation and support services, eg community facilities, health and fitness, community functions etc.</p>								
<p>18. Total number and breakdown of customers at the site</p>		<table border="1" data-bbox="1025 836 1682 986"> <thead> <tr> <th data-bbox="1025 836 1223 922">Residential</th> <th data-bbox="1223 836 1402 922">Small business</th> <th data-bbox="1402 836 1536 922">Large business</th> <th data-bbox="1536 836 1682 922">Total</th> </tr> </thead> <tbody> <tr> <td data-bbox="1025 922 1223 986">39</td> <td data-bbox="1223 922 1402 986">0</td> <td data-bbox="1402 922 1536 986">0</td> <td data-bbox="1536 922 1682 986">39</td> </tr> </tbody> </table> <p>There are currently 39 residential apartments completed as part of Stage 1 at Bowden Brae, with 35 of these apartments currently occupied. The 4 that are not occupied by residents are under the management of Uniting.</p>	Residential	Small business	Large business	Total	39	0	0	39
Residential	Small business	Large business	Total							
39	0	0	39							
<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 Uniting 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 for Bowden Brae's 39 apartments as part of the Stage 1 development is 120 kWh per annum.</p> <p>Once the Stage 2 development is completed and fully occupied and thus completing the village, the entire site is forecast to use approximately 600 kWh per annum. This comprises of 420,000 kWh per annum for residents and 180 kWh per annum for common areas.</p> <p>The average residential apartment consumption is anticipated to be approximately 3,000 kWh per annum.</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 Uniting.</p>
<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 pattern approved Automated Meter Reading (AMR) meters.</p> <p>The meters to be installed are Secure Liberty Single Phase Meters by PlusES. This metering option will allow consumers to access retailer market offers should they ever choose.</p>

Requirement	AER Guidance	Applicant's Response
<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 use AMR data to issue bills to residents (customers) on a bi-monthly (2 month) basis, on behalf of Uniting.</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>Billing of all existing residents of Bowden Brae will not commence until the retirement village has been converted into an embedded network following all approvals being provided by the AER.</p> <p>The proposed bill template for Bowden Brae can be found in Appendix J.</p>
<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>Uniting's <i>Customer Complaint & Feedback made by Resident Procedure – Retirement & Independent Living</i> can be found attached as Appendix C.</p> <p>This procedure is consistent with 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 Uniting in accordance with the <i>Privacy Act 1988 (Cth)</i> and the Australian Privacy Principles.</p> <p>Uniting is already a member of the Energy and Water Ombudsman New South Wales (EWON) for their other embedded network sites, and will ensure that their Bowden Brae retirement village also joins the scheme once the embedded network is implemented.</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"> • The enthusiasm from Bowden Brae residents to have the opportunity to purchase electricity from Uniting was reflected in their response to the embedded network conversion consent forms. Only 2 of the 35 occupied apartments abstained from voting, while 31 voted in favour of the transition to an embedded network infrastructure (see Appendix D for copies of resident responses) • 88.57% of current residents gave their consent for the embedded network conversion. • Uniting is offering residents competitive electricity rates / discounts for Bowden Brae. The rates being offered to customers represent a discount 21% compared to the 2021-22 Default Market Offer (DMO) in the Ausgrid region for a home consuming 3,900 kWh per annum. The discounted rates are: <ul style="list-style-type: none"> ○ Usage Rate: \$0.21868 (inc GST) ○ Supply Charge: \$0.6776 (inc GST) • Planned face to face presentations had been arranged with residents, however due to COVID restrictions in NSW that prevented people meeting in the same room other approaches had to be undertaken to communicate to residents, and provide opportunities for residents to answer questions and receive feedback. This was done by the following means: <ul style="list-style-type: none"> ○ Pre-recording the presentation and then uploading it to YouTube so that all residents could click on the link that was emailed to them for easy viewing of the presentation. This presentation provided explanation about embedded networks, the embedded network conversion, the Individual Exemption, key AER disclosures relating to the Individual Exemption, and accompanying documentation. ○ The documentation was mailed to each resident so that residents could watch the presentation with the documents in hand. ○ Residents were invited to email or phone through queries, and responses were provided to those queries. ○ A further ZOOM Question and Answer video conference meeting was arranged with residents so that participating residents could hear the questions being raised by other residents and in turn the responses to those question.

Requirement	AER Guidance	Applicant's Response
<p>26. Further information (optional) - continued</p>		<ul style="list-style-type: none"> • Whilst in a perfect non-COVID world the preferred process would have been to meet residents in person, however this process ensured that residents could receive the required information and explanation, whilst providing a variety of means for residents to ask question and receive responses. • Uniting 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, Uniting have undertaken in this application to adopt measures that support 'right of choice' for residents to purchase off a licensed retailer without incurring any financial detriment. These measures are explained in the section relating to Migration of Detriment.

Section 3: Converting Embedded Networks (Retrofitting)

Requirements	AER Guidance	Applicant's Response
<p>Provision of information to customers</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"> The information provided to customers (including any advantages and disadvantages associated with the conversion); and How and in what format the information was relayed to customers. <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 Bowden Brae retirement village to become an embedded network.</p> <p>The provision of information included:</p> <ul style="list-style-type: none"> Resident notifications of planned in-person presentations (scheduled and postponed due to COVID-19 restrictions) and online video conferencing opportunities that everyone received, plus the flyer placed on noticeboards (Appendix E) Following the cancellation of planned physical on-site presentations as a result of COVID-19 restrictions, a YouTube video presentation was shared with all residents via email on 7 July 2021 (presentation as shown in 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 & residential sites</i> information document were made available to residents within this meeting. An information folder containing the following documentation and forms was delivered into all resident letterboxes on 7 July 2021: <ul style="list-style-type: none"> <i>Form F – Embedded Network Conversion Information</i> (Appendix G) <i>Form G – Resident Consent for Network Agreement</i> (Appendix H) <i>Forms A to E - Bowden Brae Welcome Pack</i> (Appendix I) A follow up Q&A forum held via a Zoom video conference call was hosted by NES, with key Uniting Personnel in attendance, on 14 July 2021. <p>The varied forms of communication with residents and the opportunity of a follow up video conference session to answer queries, in addition to those individual queries via telephone or email were greatly appreciated.</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"> • Form F - Embedded Network Conversion Information (Appendix G) • Bowden Brae Welcome Pack - Form C Exempt Electricity Supply Disclosure Statement (Appendix I) <p>Residents were informed of their right of choice in the resident presentation provided via a YouTube video that was distributed to residents via email on 7 July 2021 (see Appendix F) which was reinforced in a Zoom video conference call held on 14 July 2021.</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 their right of choice in the YouTube video presentation that was distributed to residents via email on 7 July 2021 (see Appendix F) which was reinforced in a Zoom video conference call held on 14 July 2021. This presentation included information on how customers may need to enter into an energy only contract with retailers should they choose to access a retailer offer. It was explained that market offers are offered at the retailer's discretion and could not be warranted by the Exempt Seller.</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"> • Form F - Embedded Network Conversion Information (Appendix G) • Bowden Brae Welcome Pack - Form C Exempt Electricity Supply Disclosure Statement (Appendix I)

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 a YouTube video presentation that was distributed to residents via email on 7 July 2021 (see Appendix F).</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"> • This information and all relevant applicable disclosures are also explicitly outlined in the following documentation supplied: • Form F - Embedded Network Conversion Information (Appendix G) • Bowden Brae Welcome Pack - Form C Exempt Electricity Supply Disclosure Statement (Appendix I)
<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>Bowden Brae Welcome Pack</i> (Appendix I) which was delivered to residents via their letterboxes on 7 July 2021. The Welcome Pack includes:</p> <ul style="list-style-type: none"> • Form A – Discounted Electricity at Uniting Bowden Brae Normanhurst (which includes outlining the discounted tariffs being offered) • Form B – Exempt Electricity Supplier Agreement • Form C – Exempt Electricity Supply Charter • Form D – NSW Low Income Household Rebate (information) • Form E – Recurring Services Agreement (and Direct Debit Request Authority form)
<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 Bowden Brae is outlined in all key documentation supplied to residents, including:</p> <ul style="list-style-type: none"> • Form F - Embedded Network Conversion Information (Appendix G) • Form G – Resident Consent for Network Agreement (Appendix H) • Bowden Brae Welcome Pack (Appendix I)

Requirements	AER Guidance	Applicant's Response														
Explicit Informed Consent																
<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"> • Provide evidence of the consent document. • Confirm the percentage of consent given. • If there has been any dissent, explain the concerns raised and how these have been addressed. • Provide an example of a signed consent form. <p>Note: evidentiary documents will need to be attached as an appendix to the checklist.</p>	<table border="1" data-bbox="1043 272 2036 520"> <thead> <tr> <th data-bbox="1043 272 1238 459">No. of customers at site</th> <th data-bbox="1238 272 1433 459">No. of customers who provided consent</th> <th data-bbox="1433 272 1628 459">No. of customers that refused consent</th> <th data-bbox="1628 272 1823 459">No. of customers that have not responded</th> <th data-bbox="1823 272 2036 459">% of consenting tenants</th> </tr> </thead> <tbody> <tr> <td data-bbox="1043 459 1238 520">35</td> <td data-bbox="1238 459 1433 520">31</td> <td data-bbox="1433 459 1628 520">2</td> <td data-bbox="1628 459 1823 520">2</td> <td data-bbox="1823 459 2036 520">88.57%</td> </tr> </tbody> </table> <p>Consent Breakdown:</p> <p>All returned and signed Form G – Resident Consent for Network Agreement forms can be found in Appendix D.</p> <p>Only six (6) residents raised formal queries or concerns, all of which have been responded to.</p> <p>The resident electricity tariffs being offered are all 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	35	31	2	2	88.57%
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												
35	31	2	2	88.57%												
<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 16 July 2021. Residents were given a further extension by request to hand in forms by 21 July 2021.</p> <p>This requirement was reinforced in the resident presentation held on 7 July 2021, and (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 can be summarised as per below:</p> <ul style="list-style-type: none"> • Residents requesting price comparisons to assess the Uniting prices being offered to their own billed rates. Price comparisons were prepared and emailed / mailed back to these residents. • Raised queries surrounding metering, potential power outages as part of the process and transition. 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. • Questions were posed about how they would go about purchasing electricity from another retailer if they were able to obtain better rates than Uniting 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. • Sought clarity on what the network charges related to and whether Uniting 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 within 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. • Queries relating to residents deciding to stay with their existing retailer were received and what the transition to an embedded network would mean for them. Advice was provided that NES and Uniting would assist all residents wanting to stay with their existing retailer. • Questions were raised about the common area electricity costs and how this would impact them. They were advised that there would be savings for these costs, particularly once Stage 2 was completed

Requirements	AER Guidance	Applicant's Response
Retail Contestability		
<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 planned configuration within the Bowden Brae site and provision being made as part of the Stage 2 site development as outlined in Appendix A.</p> <p>Information was sought from Ausgrid in relation to how on-market chlds 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"> • Right of Choice • Steps to take if they wish to purchase energy from someone other than Uniting • Price matching <p>In the resident presentation conducted via a YouTube video that was distributed to residents via email on 7 July 2021 (see Appendix F) which was reinforced in a Zoom video conference call held on 14 July 2021. It was also covered off that no resident would be financially disadvantaged by the retrofit should they wish to purchase electricity from anyone else other than Uniting.</p> <p>For consumers who opt to remain with their current retailer then their existing smart meters will remain and not be replaced.</p>
Customer Dispute Resolutions Services		
<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>Uniting's Feedback and complaints procedure can be found attached as Appendix C and is referenced in the Form C, contained within the Bowden Brae Welcome Pack (Appendix I).</p> <p>Uniting is already a member of the Energy and Water Ombudsman New South Wales (EWON) for their other embedded network sites, and will ensure that their Bowden Brae retirement village also joins the scheme once the embedded network is implemented.</p>

Requirements	AER Guidance	Applicant's Response
AER Consultation		
<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"> • the AER consults on these types of applications • the application will be published on the AER website, and • the AER will accept public submissions • the consultation period will be open for 20 business days. 		<p>Residents were informed of the AER's consultation process in the resident presentation conducted via a YouTube video that was distributed to residents via email on 7 July 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"> • Form F - Embedded Network Conversion Information (Appendix G), which includes a link to the Network Service Provider Registration Exemption Guideline March 2018 <p>Residents have since also received a further communication dated 23 July 2021 to confirm that Uniting is making plans to lodged their application with the AER 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
Additional retrofit mitigation information		
<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"> • Consumers indicate their intention to remain with their existing electricity retailer. • AEMO will issue Child NMIs to Network Energy Services as the ENM. Network Energy Services will allocate the 'Child' NMIs to on-market childs. • All consumers within Stage One have smart meters so there will not need to be a meter change for residents choosing to remain with their current retailer. • 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. • Residents have been informed that they will not incur any costs for meter upgrades or changes that may be required. • 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