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To: [EPWA Alternative Electricity Services](#)
Cc: EPWA-Submissions@dmirs.wa.gov.au
Subject: embedded network CoP
Date: Wednesday, 28 February 2024 10:54:25 PM

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With reference to your email about above.

I've had a cursory look over at the material – I did also provide some feedback previously.

Please don't reveal my personal details should you decide to use any of my comments on your web site.

What's missing is a layman's explanation of what an apartment building is going to have to do differently, and what you think the cost implication will be for the strata co. - take mine as an example:

- 26 apartments
- The strata co has a contract with Synergy who send a bill every month of the single whole-of-site meter
- The embedded network meters that are owned by the strata co are monitored by a 3rd party that simply provides access to meter consumption readings through a cloud portal. The 3rd party plays no part in billing or providing statements.
- The Strata co (either CoO members or the strata manager) downloads consumption for each meter every 3 months and the Strata manager prepares and issues an invoice for each owner. The owners are billed at the Synergy A1 rate.
- There are by-laws in place that set out the basics of how electricity is billed and there are debt collection by-laws etc.
- This all works fine – it's what the developer/builder gave us – and what the government approved in the first place.

Please can you give me a bullet point summary of what we, the owners of the embedded network and the building, are going to have to do that is different to the above?

My understanding is that we will be saddled with all sorts of admin burdens – developing and maintaining financial hardship policy, family violence policy, policy after policy after policy. Strata companies are run by volunteer owners – not big corporates.

In Strata, when one owner stops paying, the others have to subsidise them until they can recover debt? – having all these extra policies just makes it very easy for bad apple owners to take advantage of other innocent owners. I don't think it's fair.

Furthermore, this only deals with electricity – what about water bills and apartment levies? – why is the government focusing on electricity only and not forcing Strata Co's to have all these ridiculous policies for those services too?

To me it demonstrates the governments fragmented and ill-thought out approach to this stuff.

In the last 5 years since this building has existed there has not been a single complaint, inquiry or comment from any owner about any of the bills they receive.

So I am frankly quite surprised about the need for some more government regulation – as far as I can see you have not given any statistics about significant complaints from people in embedded networks about the actual supply and cost of their electricity – is this a real or an imagined issue?

For info, the developer of the building I bought into signed the Strata Co up to a five year contract with a meter-reading company. As soon as that period was over we engaged another company to provide the same service for about 25% of the price of the original provider. So for 5 years we got ripped off. You ought to be focusing your attention on builders and developers that hand these dodgy arrangements over in the first place, not adding administrative burden on the people that buy apartments.

PS – Our Strata Co has still not received a single formal notification about this new policy. Our Strata Manager is totally unaware.

Can you confirm whether you have actually formally written to any Strata Company about this?

When does the voluntary code become mandatory? And who and how is it going to be enforced?

The government does not even enforce existing building regulations – zero inspection of anything a builder does – my apartment building was supposed to have insulation in it – but the builder did not install it to save money. When I've queried how this could happen when it's specified on the building permit drawings etc, I get nowhere. Builders have even put through fraudulent applications for building permits and when we point this out to the government permit authority and the responsible government ministers, they do nothing!

The building is full of basic defects like fall on floors not being sufficient to drain storm water – things that a building inspector would have picked up if only there was requirement for one to inspect. This sort of thing is costing owners a fortune to fix – the builder deregisters as soon as he gets a complaint so that he can't be pursued.

You'll have to forgive me for my rather jaded and negative response to this lot – just tired of the government interfering in things that don't matter much, and ignoring things that do matter a lot.

Regards, 