Draft Voluntary Embedded Networks Code of Practice

Consultation paper submission form

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Submissions should be emailed to EPWA-Submissions@dmirs.wa.gov.au or posted to Energy Policy WA, Locked Bag 11, Cloisters Square, WA 6850 by 5pm (AWST) 23 June 2023.

Please indicate on the covering page of your submission if you wish part or all of your submission to be treated as confidential. Unless otherwise requested, submissions will be made available on the Energy Policy WA website.

Question number	Consultation area and section reference in Consultation Paper	Questions for consultation	Your comments
1.	**Embedded networks business models** (section 3)	Are you aware of any significantly different business models to those described in this Consultation Paper used in embedded networks in Western Australia?	No
2.	**Embedded network seller definition** (section 4)	Do you have any suggested changes to the proposed 'embedded network seller' definition?	No
3.	**Embedded network seller obligations** (section 5.1)	Do you have any comments on the general obligations on embedded networks sellers proposed in clauses 1, 2 and 3 of the Voluntary EN Code?	Yes. Embedded Network Sellers must pay for, or provide credit for, all excess power generated by customers with solar panel systems installed. This power is, in many cases," on sold" by the seller at no cost.
4.	**Draft Disclosure Statement** (section 5.2)	Does the draft Disclosure Statement capture all information that should be disclosed to customers upfront? If not, what other information should be included?	
5.	**Metering arrangements** (section 5.3)	Do you have any comments on the proposed arrangements for metering outlined in clause 5 of the Voluntary EN Code?	For customers with solar panel systems installed, the meter must show the power used and the power generated OR must be a bidirectional meter which shows the net difference between the two.
6.	**Disconnections and interruptions standards** (section 5.8)	Do you have any comments on the standards for disconnections and interruptions proposed in clause 10 of the Voluntary EN Code?	
7.	**Access to renewable sources of electricity** (section 5.11)	Are the requirements in clause 14 of the Voluntary EN Code sufficient to facilitate access to electricity from renewable sources? Is anything else required, for instance additional information provision?	

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8.	**Metering functionality** (section 6.1.1)	8.1 Should private meters installed in new embedded networks be subject to minimum standards in terms of functionality? For instance: • meter captures and stores data in 30 minute intervals; • meter captures and stores data in 5 minute intervals; or • meter supports remote reading (communications enabled).	Yes - see 5 above
		8.2 Should metering standards only be applied to new builds, or also to meter replacements and upgrades in existing embedded networks?	
		8.3 Should such requirements also apply to conversions to embedded network (known as meter merges)?	
		8.4 What exemptions might be required if metering standards are applied?	
9.	**Meter ownership and access** (section 6.1.2)	9.1 Should there be a requirement that, from a certain date, private meters installed in embedded networks must be owned outright by the property owner (or collective property owners if strata titled)?	
		9.2 Should there be a requirement that, from a certain date, private meters installed in embedded networks must meet certain requirements for access,	

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		interoperability and/or common communication standards?	
		9.3 Should any other types of assets in the embedded networks (e.g. DER assets) be covered by similar ownership and access requirements or is it acceptable for ownership of these other types of assets to be outsourced to reduce upfront costs to customers?	
10.	**Regulation of safety requirements in embedded networks** (section 6.2)	Do you consider there is a need for greater regulation of safety requirements within embedded networks? Why/why not?	