

From: Eugene Browne
To: [EPWA - Submissions](#)
Cc: [REDACTED]
Subject: Late Comments from WARVRA - Embedded Networks
Date: Monday, 26 June 2023 4:35:26 AM

You don't often get email from [REDACTED] [Learn why this is important](#)

Good Morning,

On behalf of WARVRA the Western Australian Retirement Villages Residents Association I would like to thank you for keeping us up to date with progress of the Embedded Network survey and the Voluntary code.

Unfortunately due to Covid, holidays, and under resourcing, we have been unable to get a full submission together to respond by the latest deadline of 5.00 PM 23 June 2023 – despite your best efforts..

We became quite overwhelmed by the scope of your work, and realised that Retirement Villages are just a small portion of the customer base.

Many of the issues raised do not occur in retirement villages so it seems we are not the worst off by a long shot.

In a last minute effort to perhaps provide some quick useful comment please (if you can) consider the following.

Our own survey of 100 villages returned 39 responses of which 13 had embedded networks.

The main issues that emerged can be summarised into two categories:

- 1 Overcharging: The current policy allows village operators to on- sell at Tariff A rates and so many do. And strictly this is not against the rules or agreements. However many residents believe this to be unfair because of excessive windfall profits that operators get from it. Especially charging the full supply charge fee which in many cases is just pure profit – one supply meter at the gate being multiplied by 200 or more without any real justification. Residents think that excessive profits in this way and from the differences in purchase and selling prices - giving more revenue to operators, is morally unacceptable - and they want a **policy change**. Additionally they want any such profits from on- selling to be declared to residents and applied within the village where they are generated - rather than being undeclared to residents and disappearing into the consolidated revenue of the operator. The principle here is that operators should not be able to make excessive profits from on-selling government generated electricity funded by the taxpayer.
- 2 Solar power generation. Within some villages, solar generation has been funded and it benefits the residents significantly. In others, the benefits are not passed on. In others again use of solar is not encouraged or even possible as it is seen to be eroding the easy windfall profits of on- selling - **at the residents expense**. Capital costs are sometimes through government grants, through the village operator, through the residents themselves privately and with subsidies. Many residents

benefit in terms of less expensive electricity bills, but few actually see personal revenue from that solar generation. Operators see more of that. In many cases the electricity generated cannot be fed back into the grid and goes to ground – wasted.

Solar generation seems to be a very frustrating topic in villages generally, especially where no incentives are given for its use, and where the full potential of the technology is not being realised to benefit the residents. A more funded and coordinated approach for the sector to maximise benefits both for the resident, operator and the environment is perhaps needed. Some model villages could perhaps be developed with some form of sponsorship or subsidisation to demonstrate the benefits and save the planet. I suppose all this could be summed up as a need for encouragement, guidelines, or regulations to ensure that the benefits of solar generation are made available within retirement villages at an affordable cost to residents.

Our final comment refers to the Voluntary Code. **Our experience is that voluntary codes do not work.** Regulation is needed. So we would be supportive of putting many of the aspects of the Voluntary Code into the mandatory AES code under the AES framework as soon as possible.

Please continue to keep us informed of developments relating to Embedded Networks and of any opportunities we might have in the future to influence policy along the lines outlined, and please accept our apology for this late and succinct reply.

Yours sincerely,
Eugene Browne
Vice President
WARVRA.

