



1 February 2021

Attention: Ms Susan Faulbaum  
Direction, Consumers and Markets  
Australian Energy Regulator  
By email: [AERexemptions@aer.gov.au](mailto:AERexemptions@aer.gov.au)

Dear Ms Faulbaum,

**AMP Capital Investors Ltd application for individual exemption – Marrickville Metro Shopping Centre**

██████████, on behalf of ██████████ welcome the opportunity to make a submission to the above application from AMP Capital Investors Ltd (**AMP Capital**) (copy of application attached – the **Application**). ██████████ provide facility management, energy and sustainability services to ██████████. We would like to make the following observations in relation to ██████████ tenancy becoming part of the embedded network.

1. Inclusion in an embedded network can result in the loss of annual network tariff reviews and visibility over the breakdown of electricity charges, such that a new tariff, or changes are made to an existing tariff, are not easily determined from the bundled rates.
2. It was unclear in the Fact Sheets provided when the Letter of Intent was distributed whether a small market tenant could refuse to join the network entirely – this appears contradictory to the consumers right to choose a retailer.
3. Referring to the applicant's answer to Q. 37 – *"a. Price-matching or bettering their genuine electricity offer"*, WINConnect on behalf of AMP Capital has not made an equal or better offer than the rates ██████████ are already on with their current retailer. We are awaiting feedback which has raised a concern that ██████████ consent was premature and may have little benefit financially or environmentally.

We also draw your attention to the fact that price matching does not appear to account for the type of energy. Decisions made internally at ██████████ may mandate the purchase of renewable energy for their tenancies. There is no indication that WINConnect are GreenPower certified and whether they will commit to price matching offers for this product type. While the legislation highlights *"price matching for genuine offer"*, it also states that the reality of the tenant's contracted retailers being able to invoice energy-only charges is *"at their discretion"*. This may mean tenants with a requirement to purchase renewable energy are now forced into embedded networks and unable to cost-effectively gain access (where the contracted retailer refuses to

invoice 'energy-only charges') to renewable energy that they would otherwise be able to do through a bundled energy invoice for small sites. By installing an embedded network, the tenant runs the risk that they are not afforded a comparable quality/type of the supply as they could have been, should the embedded network not be installed.

4. In the Application, there is no mention of the source of energy that will be provided to the tenants – this was also not made clear in the Fact Sheets. How will metering and billing systems be set-up to accommodate on or off-site future renewables to enable tenant benefit? This suggests there is a chance that [REDACTED] will not be able to take advantage of new technology or changes to their energy supply type (i.e. to renewables), if and when they become available.

Yours sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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