

Checklist for individual exemption application (other than PPA providers)

[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
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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>	<p>Community Corporation 22654 Inc.</p>
2. Trading name (if different to legal name).		<p>N/A</p>
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>	<p>ABN: 78 348 259 286</p>
4. Registered postal address for correspondence.		<p>Rob van den Bos C/o Best Strata PO Box 229, Fullarton SA 5063</p>
5. Nominated contact person, their position and contact details.		<p>Community Corporation 22654 Secretary, Liz Frankel </p>

Requirement	AER Guidance	Applicant's Response
<p>6. Reasons for seeking an individual exemption (rather than an authorisation).</p>	<p>See: Section 3 of the Retail Exempt Selling Guideline.</p>	<p>We are seeking an Individual Exemption based on the advice from AER. See additional information contained in our cover letter and attachments.</p> <p>We seek an exemption because the Body Corporate needs to be able to pass on the electricity costs of C Block and the Villas to the C Block owners and the Villas owner.</p> <p>The electricity on-selling activities at the site are incidental to Community Corporation 22654's core business as we manage and maintain the site on behalf of all owners.</p> <p>The Community Corporation 22654 is the community corporation for all three blocks at the site (Blocks A, B and C) and the sub corporation of the Villas.</p> <p>The Villas include Villas 1, 2 & 3 and the Villa Store which is common to their sub corporation. Each of these 4 buildings has their own sub-meters which are connected into the C block meter box.</p> <p>C block is made up of 20 identical studio apartments which were originally operated (for many years) as motel rooms. Meters were therefore not individually installed and it would be cost prohibitive to owners to do so now.</p> <p>There are not any tenants at the site that are eligible for concessions.</p> <p>There are two retail main meters that meter the use of C block and the villas.</p> <p>Community Corporation 22654 determines the individual electricity costs for the 20 units of Block C by dividing the total cost of electricity equally between the units, after the reading of the sub meters (3 x villas and villas store) have been deducted from the total of the bill. See our attached spreadsheet example.</p>
<p>Last updated 5 November 2020</p>		

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<p>7. Site address and description of current and future use/s.</p>	<p>Also attach a site map as an appendix to this checklist.</p>	<p>Site Address:18 Moseley St Glenelg SA 5045</p> <p>Description of Use: The complex was built in 1975 and consists of Block A, Block B and Block C, with 34 individual units owned by 20 individual owners. (See attachment #1).</p> <p>All Block A and Block B owners have their own electricity retail meters and therefore pay for their own quarterly electricity direct to the retailer.</p> <p>Block C is made up of 20 identical Studio Apartments owned by 12 individual owners. These apartments are not individually metered.</p> <p>The whole site is a mix of permanent residents and short term letting businesses.</p> <p>Site map submitted with application? Yes, see attachments: Community Corporation 22654 Site Plan Aerial View showing Blocks A, B, C, Villas and villa store</p>
<p>8. Primary activity of the Applicant's business.</p>	<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>Community Corporation Management</p>

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9. Form of energy for which the Applicant is seeking an individual exemption.	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.	Electricity is connected to main grid
10. Is the Applicant establishing, or have they established, energy supply in an area where there are no other viable energy supply arrangements available?	If not, please provide examples of how customers will be able to access alternatives, should they choose to utilise their power of choice.	We have an established energy supply.
11. Proposed commencement date for the sale of energy.		Immediate
12. Mailing address for site correspondence.		Best Strata have addresses of all individual owners on file. If you need to access this you can contact Rob van den Bos [REDACTED]

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<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>Community Corporation 22654 has been under new management for the past 12 months.</p> <p>Current Management wishes to continue to on-sell electricity (actual costs) to a number of individual owners (C block-without retail meters) as an ongoing practice.</p>
<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>N/A</p>

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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).	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?	The Community Corporation 22654 only purchases energy from a retailer for the C Block/Villa's as the metering configuration does not allow individual arrangements. The Community Corporation will always provide this service and is pro- active in sourcing alternative quotes on a regular basis to make sure owners are getting value for money. Alinta does not have exclusive rights to supplying the energy, this is negotiated by the Community Corporation management.

Section 2: Particulars relating to the nature and scope of the proposed operations

Requirement	AER Guidance	Applicant's Response
16. Will the Applicant's customers be their tenants? Are tenants at the site residential or business customers?		No, customers are not our tenants. The customers are the owners of the units.
17. Is the Applicant providing other services to tenants or residents on the site to whom they intend to sell energy? OR will their only relationship to the persons on the site be the sale of energy?	If other services are provided, specify what they are and the contractual or leasing arrangements under which these services are being provided.	We provide Body Corporate Management

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18. Total number and breakdown of customers at the site	Please see cover letter	Residential	Small business	Large business	Total	
		Block A - 8 x units all with their own retail meters Block B – 6 units all with their own retail meters Block C – 20 x studio apartments with no individual meters Villas 1, 2 & 3, plus Villa store all with sub meters to C block.				
19. Will the Applicant be on-selling energy purchased from an authorised retailer or purchasing it directly from the wholesale market?		On-selling from an authorised retailer				

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>67,000 Kw PA which is the total of the C block bill, including the villas.</p> <p>Please see attached spreadsheet showing the reads of the villa's sub meters</p> <p>2,700Kw per C Block Unit</p> <p>Residential Customers</p>
<p>21. Will the Applicant's customers be wholly contained within a site owned, controlled or operated by the applicant?</p>		<p>Yes</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>No.</p> <p>Please see cover letter and attachments</p>

Requirement	AER Guidance	Applicant's Response
23. Please confirm these meters will allow the Applicant's customers to change retailers as required by the AER's Network Guideline.	Specify the types of meters to be installed at the property and confirm that they will allow customers to change retailers.	N/A
24. In what form and how often will customers be billed? Will the Applicant be issuing bills or through a billing agent?	Provide a bill template.	<p>Customers will be billed quarterly through our Body Corporate Management, Best Strata, through electronic means or by post if requested. All future bills for C Block units will show the average energy use for that period per unit.</p> <p>See cover letter and attachments</p>

Requirement	AER Guidance	Applicant's Response
<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>Community Corporation 22654 have joined the South Australian Ombudsman Scheme. Please see attachment providing proof of our membership.</p> <p>In regard to Dispute Resolution the Community Corporation will follow the inducted guidelines of the Energy & Water Ombudsman SA which include;</p> <ul style="list-style-type: none"> • deal with complaints in a fair, just, informal and timely manner • act independently while maintaining good working relationships with members and other stakeholders • be readily accessible to consumers of electricity, gas, and water and sewerage services in South Australia • be fair to all parties to ensure a just, economical, informal and quick resolution • maintain an environment of privacy and confidentiality <p>The Community Corporation will follow the guidelines within the Case Management Procedures Manual of the Energy & Water Ombudsman SA. If a dispute cannot be resolved by the Community Corporation the assistance of the Ombudsman will be requested.</p>
<p>26. Further information (optional)</p>		<p>Please refer to below summary, Cover Letter and attachments</p>

See below a summary.

As discussed, the Community Corporation complex that we manage was previously an old motel (The Taft Motel), which many years ago was divided up into individual lots owned by 21 individual owners.

Utilising the existing electricity infrastructure, and just as the Taft Motel did previously, we read the retail meters and then pass on the individual electricity costs to the 12 individual owners (of the 20 units within the C Block complex that do not have their own individual electricity retail meters. The process is transparent so that all individual owners have access to the original Alinta Electricity Bill, along with a spreadsheet showing the process for calculating the individual electricity costs.

Note, there are no additional charges, eg we pass on the exact costs of electricity to individual owners. (We do not charge them an admin fee to: read retail meters, calculate usage, or distribute the account. Electricity charges are included on the owner's quarterly levy rates notice, distributed via Best Strata, listed as a separate electricity charge.

As Community Corporation Managers of the entire site, we cannot absorb the electricity costs as part of our strata costs and then pass it onto all owners via their quarterly levies. This is because the individual owners within Block A & B all have their own retail meters so are already paying for their individual electricity directly to the retailer.

The only way we can pass on the electricity costs to the C Block owners is to on-sell the electricity to them individually.

As the Secretary of the Corporation and as an owner of a C block Lot, I believe that we are offering a fair and transparent service of electricity billing to all these owners.