



## **APPLICATION FOR INDIVIDUAL EXEMPTION**

**STOCKLAND FORSTER SHOPPING CENTRE**

## General Information Requirements

### 1. Legal Name

Stockland Property Management Pty Ltd

### 2. Trading Name

Stockland Forster Shopping Centre

### 3. Australian Company Number (ACN)

000 059 398

### 4. Registered Postal Address for Correspondence

Stockland Property Management Pty Ltd  
Level 25, 133 Castlereagh Street  
Sydney NSW 2000

### 5. Nominated Contact Person

Andrew Hill  
Procurement Manager  
T: 02 9035 2706  
E: [andrew.hill@stockland.com.au](mailto:andrew.hill@stockland.com.au)

### 6. Why you are seeking an individual exemption, and why you believe that an exemption (rather than retailer authorisation) is appropriate to your circumstances?

Stockland Property Management Pty Ltd is seeking an individual exemption for the retrofit of an existing network to an Embedded Network.

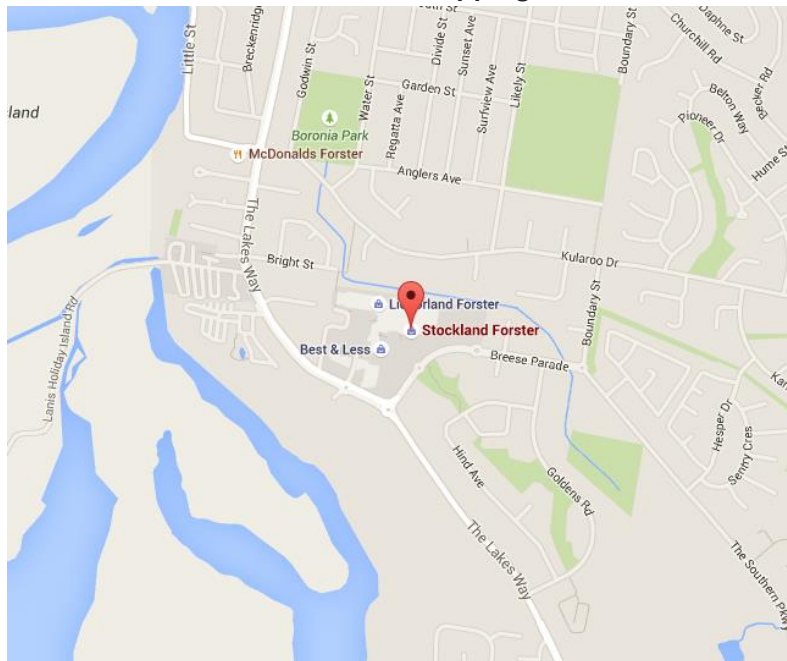
The proposed on-selling activities are incidental to Stockland Property Management Pty Ltd's core business of managing the shopping centre.

### 7. The address of the site at which you intend to sell energy, including a map of the site and brief description of this site and its current and future use/s.

Stockland Forster Shopping Centre is located at Breese Parade, Forster NSW 2428.

Stockland Property Management Pty Ltd intends to continue the site as a shopping centre in the future.

## Stockland Forster Shopping Centre



**8. The primary activity of your business (for example, managing a shopping centre).**

Stockland Property Management Pty Ltd's primary activity is operation and management of shopping centres.

**9. The form of energy for which you are seeking the individual exemption (electricity or gas). For electricity, please state whether the network you propose to sell is directly or indirectly connected to the main grid or is (or will be) an off-grid network.**

The form of energy is electricity.

The site is shopping centre is connected to the local electricity distribution network via 4 connection points.

**10. Are you establishing, or have you established, energy supply in an area where there are no other viable energy supply arrangements available?**

No.

**11. The date from which you intend to commence selling energy?**

1<sup>st</sup> October 2015 or from date the individual exemption is granted.

**12. Mailing addresses for premises at the site (where applicable). We may use this information to ensure that potential customers are able to participate in our consultation process.**

c/o Centre Management Office  
Stockland Forster Shopping Centre  
Breese Parade  
Forster NSW 2428

**13. Details of any experience in selling energy, for example:**

- **Date's and location/s of previous operations**
- **Form/s of energy sold**
- **Scale of operations (that is, the number, size and type of customers)**
- **An explanation of which activities will be conducted in-house and which will be contracted out to third parties.**

Stockland Property Management Pty Ltd has 7 sites on the NEM where electricity is sold via Embedded Networks with WINenergy as the ENM. Details of these sites are provided in the below table:

<b>Shopping Centre</b>	<b>State</b>	<b>EN Live</b>	<b>Energy</b>	<b>Small Tenants</b>	<b>Large Tenants</b>	<b>Total Tenants</b>
The Pines	VIC	Mar 2008	Electricity	117	6	123
Tooronga	VIC	Jul 2010	Electricity	35	2	37
Highlands	VIC	Sep 2011	Electricity	25	3	28
Traralgon	VIC	Feb 2014	Electricity	49	1	50
Wendouree	VIC	May 2014	Electricity	86	0	86
Merrylands	NSW	Feb 2015	Electricity	216	9	225
Shellharbour	NSW	Feb 2015	Electricity	266	8	274

The proposed activities related to the key functions of the Embedded Network are as follows:

- i. Sales and marketing to small and large customers will be conducted by Stockland Property Management Pty Ltd's chosen Embedded Network Manager (ENM), WINenergy;
- ii. Meter readings, data management and production of customer bills will be managed by Stockland Property Management Pty Ltd's ENM, WINenergy.
- iii. Customer bills will be issued to customers of the Embedded Network in a format compliant to the AER's Core Exemption Conditions.
- iv. Stockland Property Management Pty Ltd's ENM, WINenergy, will manage the debt collection process;
- v. Stockland Property Management Pty Ltd's ENM, WINenergy, will manage all relevant licences and compliance with all applicable legislation. WINenergy has in place a Complaints Handling and Dispute Resolution Policy.

**14. Whether you currently hold, or have previously held or been subject to, an energy selling exemption or a retail licence (retailer authorisation) in any state or territory. If so, please provide details.**

As per the table of sites provided in Question 13, all sites have Registered Retail Exemptions (R1 and R5) and Network Exemptions (N1 and N5).

**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)?**

In the event that Stockland Property Management Pty Ltd could no longer supply electricity to the tenants, the Embedded Network will be designed to allow the tenant to enter into an Electricity Sale Agreement with an authorised retailer of their choice.

## Particulars relating to the nature and scope of the proposed operations

- 1. Will your customers be your tenants? If so, are they residential or commercial/retail? Are they covered by residential or retail tenancy, or other legislation governing accommodation that is a person's principal place of residence (for example, retirement village legislation, residential parks or manufacturing home estates legislation) in your state or territory?**

- Yes, the customers will be tenants of the shopping centre;
- The tenants are retail/commercial businesses;
- The small retail business tenants and some of the large retail tenants are covered by the relevant state-based Retail Shop Leases Act.
- There are no residential customers as part of this Embedded Network.

- 2. Are you providing other services (for example, accommodation/leasing of property) to persons on the site who you intend to sell energy to? Or will your only commercial relationship to persons on the site be the sale of energy? If you are providing other services, please specify what the services are, and the contractual or leasing arrangements under which these services are being provided.**

- Yes, Stockland Property Management Pty Ltd are providing retail and commercial leased premises;
- The leases to retail tenants will be covered by the relevant Retail Shop Leases Act.

- 3. What is the total number of dwellings/premises at the site? Please provide a breakdown between residential and business customers (and whether they are small or large as defined for the jurisdiction in which you intend to operate)?**

- Total number of tenants: 98
- Number of small business tenants: 85
- Number of large business tenants: 13
- No residential customers will be part of this Embedded Network.

- 4. Will you be on-selling energy (that is, selling energy purchased from an authorised retailer) or purchasing it directly from the wholesale market?**

Stockland Property Management Pty Ltd will be on-selling electricity purchased from an authorised electricity retailer.

- 5. If purchasing from an authorised retailer, have you formed, or do you intend to form, a bulk purchase contract with the energy retailer, and how far into the future does this, or will this, contract apply? If you have formed, or intend to form, a contract, please provide a brief summary of this arrangement.**

Stockland Property Management Pty Ltd currently has an electricity supply agreement with Origin Energy in NSW which expires on 30/06/2017.

Stockland Property Management Pty Ltd will procure electricity from a licensed retailer prior to the expiry of the existing contract.

**6. What is the estimated aggregate annual amount of energy you are likely to sell (kilowatt hours or megawatt hours for electricity and mega joules or giga joules for gas) and the average expected consumption of customers for each type of customer you service (that is, residential customers and retail or commercial customers)?**

- The estimated annual consumption of the shopping centre: 2,635 MWh;
- The estimated annual consumption of small business load is: 1,755 MWh;
- The estimated annual consumption of large business load is: 880 MWh;
- No residential customers will be part of this Embedded Network.

**7. Will your customers be wholly contained within a site owned, controlled or operated by you? (For the purposes of this question, a body corporate may be taken to 'operate' premises it oversees).**

Yes.

**8. Will each premises/dwelling be separately metered? If the application is for a new development or a redevelopment and customers will not be separately metered, please explain why not.**

Yes, each premise will be separately metered.

**9. What types of meters will be used? For example, basic/accumulation meters, manually read interval meters or remotely read interval meters? Will these meters allow your customers to change retailers (i.e. not source their energy from you)?**

Stockland Property Management Pty Ltd will install manually or remotely read interval metering to measure the electricity consumption for all on-market and off-market tenants in the Embedded Network.

The Embedded Network metering arrangements will allow tenants freedom of choice of retailer and metering provider.

The upfront costs of the Embedded Network installation will be borne by Stockland Property Management Pty Ltd. There will be no upfront costs from Stockland Property Management Pty Ltd for the tenant to switch between an on-market or off-market electricity supply arrangement.

**10. What accuracy standards apply to the meters? Do the meters comply with Australian Standards? If so, specify which Standard or Standards. For electricity meters, will the meters comply with National Measurement Act 1960 (Cth) requirements for electricity meters installed from 1 January 2013?**

All electricity metering installed in this Embedded Network will be National Measurement Institute approved utility electricity meters. All electricity meters installed will comply with the National Electricity Rules, Electricity Customer Metering Code with the National Measurement Act 1960 (Cth) requirement for electricity meters installed from 1 January 2013.

**11. If customer dwellings/premises are separately metered, how often do you propose the meters to be read and by whom?**

Electricity meters within this Embedded Network will be manually or remotely read on a monthly basis by a contractor to Stockland Property Management Pty Ltd.

**12. How will you determine energy charges if customers are not separately metered?**

N/A, all customers will be separately metered.

**13. In what form and how often will customers be billed? Will you be issuing bills yourself or through a billing agent?**

Monthly invoices will be produced and provided to customers by Stockland Property Management Pty Ltd's ENM, WINenergy.

**14. What dispute resolution procedures do you intend to put in place to deal with energy related complaints and issues?**

Stockland Property Management Pty Ltd's ENM, WINenergy, will provide customers access to a Customer Service Team which will be contactable via phone or email, this will be the first contact point for any energy related complaints or issues.

A formal complaint can be lodged to the ENM, WINenergy who will manage per their Complaint Management Policy and Procedure or will escalate to Stockland Property Management Pty Ltd for response.

If the dispute cannot be resolved with the ENM, WINenergy or Stockland Property Management Pty Ltd the customer may raise a dispute with the Energy and Water Ombudsman NSW.

**15. What energy rebates or concessions are available for your customers and, if applicable, how can customers claim these?**

Rebates or concessions will not be applicable to this Embedded Network.

If they do become available in the future, then Stockland Property Management Pty Ltd will pass through any rebates or concessions and inform customers of any that may be available.

**16. Will you make energy efficiency options available to your customers? Will your network incorporate solar or other generation options for sustainability purposes? If so, will you use gross or net metering?**

Stockland Property Management Pty Ltd may look to install solar PV at the site. If this is completed then net metering will be installed.

**17. Please provide any further information that you consider would assist us to assess your application.**

Stockland Property Management Pty Ltd will write to all tenants advising them of its plans to implement an Embedded Network at the shopping centre.

The communication to tenants will advise them of their right to freedom of choice if they wish to select their preferred energy retailer and/or metering provider.

The tenants will also be notified that as part of the Embedded Network works their metering may be required to be changed at no cost to the tenant.

Stockland Property Management Pty Ltd will enter into an Electricity Sale Agreement with the tenant if the tenant chooses to purchase their electricity from the Embedded Network. Where a tenant chooses to not purchase their electricity from the Embedded Network, the tenant can sign a Letter of Authority authorising the tenants meter data to be sent to Stockland Property Management Pty Ltd for network only charges shadowing their existing regulated network tariff. Where a tenant chooses to not purchase their electricity from the Embedded Network or sign a Letter of Authority, Stockland Property Management Pty Ltd will request the tenant to sign a Letter of Consent.

To ensure tenants are not disadvantaged by their chosen electricity retailer not being able to provide an energy only account, Stockland Property Management Pty Ltd will offer to match the electricity price the tenant was paying prior to the creation of the Embedded Network.

Stockland Property Management Pty Ltd will ensure all on-market customers in the Embedded Network will be correctly allocated a National Metering Identifier (NMI) which will be visible to the NEM and all market participant setup correctly.

Stockland Property Management Pty Ltd prides itself on providing a quality service and on-going benefits to their tenants. The tenants will benefit from the Embedded Network through access to favourable electricity pricing and customer service.