


Author name: Name suppressed

Date of submission: Sunday, 21 January 2024

Your submission for this review:

The IPART NSW draft submission to Government provided on your webpage seems to be a fair and considerate document from the perspective of residents of our residential Land Lease Community, an over 55s village with all but a handful of residents being aged or disability pensioners. We appreciate your efforts in this regard and feel much more confident of receiving fair treatment in regard to energy provision. Attached please find my submission and 3 photos. 

The IPART NSW draft submission to Government provided on your webpage seems to be a fair and considerate document from the perspective of residents of our residential Land Lease Community, an over 55's village with all but a handful of residents being aged or disability pensioners. We appreciate your efforts in this regard and feel much more confident of receiving fair treatment in regard to energy provision.

We are, without exception, nervous about the possibility of resellers having the ability and government approval to set SACs, given the lack of concern previously shown in regard to other 'service' provision, and the lack of apparent accountability in the past.

Therefore, we are encouraged by your apparent efforts to provide advice which should promote a government approach to future legislative amendments which is even-handed and compassionate for aged and disability pensioners, and low-income residents, in land lease communities.

We appreciate the apparent and continued support for Section 77(3) of the Act, and 2018 Supreme Court (Reckless decision). All residents in our position in all land lease communities would be heartened by the ongoing support for this section of the Act and the Reckless method.

Your proposal that embedded network sellers be permitted to apply different consumption tariffs for different time periods (i.e. time-of-use tariffs), in the case of my village, Acacia Ponds over 50's Lifestyle Village, would be impossible to apply here, utilising the current infrastructure provided by village owners and operators, Hampshire Villages. The electricity infrastructure in this village is antiquated to say the least, and power meter boxes are incapable of recording time of usage details. Households share power boxes - mostly two per meter box, but in some cases, many more. There are at least two separate householders who still have the original caravan park type power box (photographs provided in enclosure). Also, our embedded network is not suitable for use of Solar.

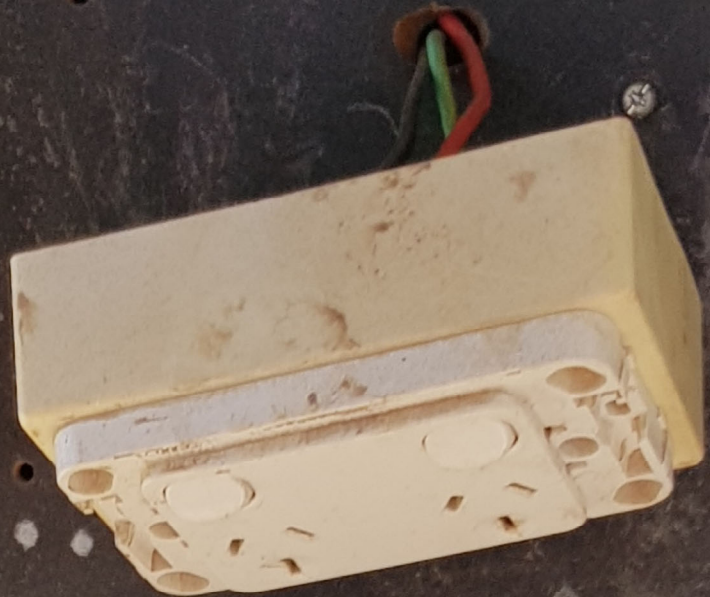
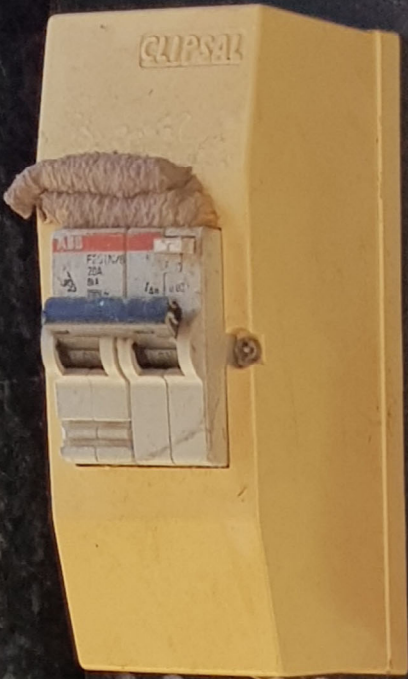
The application of SAC here would also be viewed very sceptically. The electricity infrastructure in place in this community, is outdated and has had no apparent upgrade in the life of the community. The application of an SAC here would be viewed as a case of payment for a non-existence 'service' i.e. upkeep and necessary upgrade of the infrastructure.

From the perspective of a land lease community resident, the Reckless method has the advantage of simplicity. It is easy for residents to understand. The Reckless method is suitable for customers in land lease communities as they receive a different service compared to other customer types in our community, we only receive 50amps of electricity. It was considered that it would be unfair for customers in land lease communities to be grouped with other customer types, being there is different types of embedded networks, each should have their own pricing methodology.

It was noted that the reason for the Reckless method is that operators were making huge profits before it came in. Prior to the Reckless method they faced very high rural supply charges, whilst only receive 50 amps of electricity. The Reckless method is appropriate for land lease communities where the landowner is the embedded network operator.

Our electricity accounts are now being processed by using the 'Reckless method'. The community has been using this method for the last 6 years, there has been no adverse feedback at all from the operator/owners or consumers in that time.

Thank you for the opportunity to make a submission on your draft recommendations to government.



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MAIN CONTROL  
POWER HEAD 35









PATENT NO 1

BR

BR PRODUCTS

2 BRAWITE W INSULATING PANEL

**ELSTER** A100

0246692 kWh

SB1MAB-B  
750V  
50Hz  
Cl 1.0  
10-100A

1 kWh Import 500 p/kWh

PROPERTY OF - Elster Metering Sample  
00000045

2006

CBI NO 99

**ELSTER** A100

0440450 kWh

SB1MAB-B  
750V  
50Hz  
Cl 1.0  
10-100A

1 kWh Import 500 p/kWh

PROPERTY OF - Elster Metering Sample  
00000003

2006

100

CB2 NO 100

100

**hager**

Asset ID  
2400014829

Last Test 8 Oct 2015  
Revised by ZEROHARM  
Status Failed

Centre Cable Here  
Tested to BS/EN3 3758

**DANGER**  
Equipment  
Not to be Used

hager NS 140 10A 100V  
hager NS 140 10A 100V  
hager NS 20T 10A 100V  
hager NS 20T 10A 100V

MAIN SWITCH MAIN SWITCH POWER NL PUMP NL