

3rd May 2007

Mr. Roy Kaplan
NEMMCO Ltd
Level 12, 15 William Street
Melbourne VIC 3000

Dear Mr Kaplan,

Re: Embedded Networks and Retail Competition Paper

Dear Mr Kaplan,

We wish to make a brief comment in relation to this paper. The Centre for Credit and Consumer Law Griffith University has the overall objective of promoting the attainment of a fairer, safer, and more efficient marketplace for small end-users in Queensland particularly for low income and vulnerable small end-users in the residential sector. Our comments are in relation to residential users. We do not have the expertise to comment on specific metrology and MSATS procedures but welcome the standardisation of definitions, procedures and metering in embedded networks as outlined in the Principles.

More generally we welcome the discussion on Embedded Networks that NEMMCO has initiated as part of the broader discussion of retail competition as outlined in this Paper and anticipate further discussion arising from this initiative. We are particularly interested in policy areas raised in this Paper (but which are outside the scope of this Paper). This includes whether consumers should have access to retail competition, and related jurisdictional matters such as connection arrangements. We believe it is important that these policy discussions encompass residential owners and tenants located within embedded networks such as caravan parks, retirement villages, some government housing and other dwelling arrangements. Available ABS data makes it difficult to specifically distinguish which households lie within embedded networks but there is no doubt this is an area of growth in Queensland.¹

We look forward to further discussions on these matters at both the national and jurisdictional level.

¹ See for instance tenure type and landlord type of occupied private dwellings in respect ABS Statistical Divisions in Tenants Union of Queensland (2007) 'State of the Market: A statistical portrait of the Queensland Residential Market', Brisbane, p.7.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J Bathgate', written in a cursive style.

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