

While I can understand protection for consumers; the burden being placed on operators to register to be embedded network exempt, for my business and the fees now payable appear unnecessary, in their present structure.

Surely a one off fee for registering would have been more reasonable, with an small fee for relevant changes that need to be made to the registration details from time to time?

Although I am a registered caravan park, I do not have any residential customers; in fact we really only have 21 peak accommodation days in a year with our 30 powered sites. Electricity for cooking and use in the amenities or charging mobile phones is free.

The draft decision outline actually has no bearing on my business whatsoever, except that I provide electricity as part of the rental of the site, along with other utilities. I supply water, but I don't have the same burden placed upon my business; in reality supplying water is no different, it is just another utility like electricity; don't you agree?

Would it have been more appropriate to introduce these fees for residential parks only, rather than ALL Caravan Parks? Our customers are supplied electricity, they cannot give informed consent, it's irrelevant; they are not billed by actual usage, they do not receive any additional fees nor merchant fees. Payment plans are not an option nor applicable, nor is debt recovery.

The obligations being imposed in the Energy Retail Code to Holiday Caravan Parks to me is like telling a hotel to obtain explicit informed consent, it doesn't make sense.

Thank you for the opportunity to comment

Yours sincerely

Delia Jackson

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