

30 June 2014

2014 CORPORATE PARTNERS



Ms Erin Pasley
Research Director
State Development, Infrastructure and Industry Committee
Parliament House
George Street
BRISBANE QLD 4000



Dear Ms Pasley

National Energy Retail Law (Queensland) Bill 2014



Thank you for the opportunity to provide feedback on the *National Energy Retail Law (Queensland) Bill 2014* (the Bill).



The Property Council supports the position of the Shopping Centre Council of Australia in regards to the Bill, as outlined in their 30 June submission to the Committee.



Broadly, the Property Council supports the Queensland Government's transition to the *National Energy Customer Framework* (NECF) which will bring Queensland in line with the Australian Capital Territory, Tasmania, South Australia and New South Wales.



Embedded Networks

Importantly for our members, the move to the NECF will force the transition of regulation affecting embedded networks and electricity onselling to the *National Energy Retail Law and Rules* – administered by the Australian Energy Regulator (AER).



To achieve adequate levels of customer protection and retail competition, the Property Council strongly supports this move towards AER regulation.



Under the AER guidelines, embedded networks must continue to be exempt from requirements to become a registered Network Service Provider or an authorised Electricity Retailer. This reflects the fact that embedded networks are incidental to an owner's primary business.



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Queensland specific provisions

The Property Council requires further detail regarding the Queensland specific provisions within the Bill as they relate to embedded network customers being charged more than the standing offer price.

We understand this detail will be contained in the Bill's associated Regulations.

The transition process

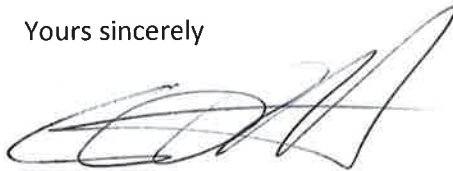
To ensure a smooth transition process to the NECF, Property Council members should be provided with sufficient time to register their embedded networks and with adequate detail in terms of Queensland specific regulation. The Property Council would be willing to assist in the distribution of this information through our member communications.

Conclusion

Thank you once again for the opportunity to provide comment on the *National Energy Retail Law (Queensland) Bill 2014*.

If you have any questions about the Property Council or this submission, please do not hesitate to contact me on cmountford@propertyoz.com.au or 07 3225 3000.

Yours sincerely



Chris Mountford
Deputy Executive Director