Respondent details

R1 - I am responding to the Energy Legislation Review Stage 2 Options Paper as a company, organisation or agency
Individual respondent details
Age
Name
Email address
Please re-enter your email address

Company respondent details
Name of company, organisation or agency
Caravan Parks Association of Queensland

Name of the best contact person from your company, organisation or agency. For example John Robinson

Blank - I have no interest in this topic
Q1.2 Why?
Q1.3 Thinking of your preferred Option, would you like to suggest any improvements?

Topic 2 Energy efficiency and demand management
Q2.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q2.2 Why?
Q2.3 Thinking of your preferred Option, would you like to suggest any improvements?

Topic 3 Interaction with applied national laws
Q3.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q3.2 Why?
Q3.3 Thinking of your preferred Option, would you like to suggest any improvements?
Topic 4 Licensing
Q4.1.1 For generation, of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q4.1.2 Why?
Q4.1.3 For generation, thinking of your preferred Option, would you like to suggest any improvements?

Q4.2.1 For network businesses, of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q4.2.2 Why?
Q4.2.3 For network businesses, thinking of your preferred Option, would you like to suggest any improvements?

Q4.3 FEEDBACK WANTED on electric vehicle charging stations and licensing. Stakeholder feedback is sought on the benefits, disadvantages and risks of licensing electric vehicle charging stations under the Electricity Act, or via the exemptions framework.
I would like to provide feedback
Q4.4 Please provide your feedback below
Small regional tourism businesses are the backbone of many regional communities. The visitors that these businesses bring into the community provide important employment opportunities for locals and stimulate the local economy through visitor expenditure. Electric Vehicle charging stations offer these businesses the opportunity to provide a service to visitors, encourage visitation and provide a small amount of additional income for the business. For smaller regional communities, if a small business does not provide the charging station the town may have to do without which would be detrimental to both the community and to visitors driving electric vehicles. The requirement to seek approval under the Electricity Act will limit the likelihood of these businesses installing a charging station, particularly if the process is overly onerous. A system whereby these installations must only be installed by licenced contractors that can submit a notice to state that the charging station has been installed would be more efficient as it would also identify the contractor responsible for the installation should there be a concern with the installation.

Topic 5 Powers of entry and resumption
Q5.1 Of the Options considered for this Topic, which one do you prefer?
I do not like any of the options
Q5.2 Why?
Our stakeholder base is caravan parks, these businesses often have many guests and/or residents located within their property and they have a duty of care to everyone within their business. All contractors are required to sign in on arrival at the caravan park – this is to protect all parties on the site and to ensure the caravan park operator knows who is on their property in the event of an incident or concern. Should caravan park operators be required to provide access to their land, it must be on the basis that the company or individual coming on site makes a real attempt to sign in with the office in the first instance. Changes to the legislation should not be extended to energy companies selling their products (i.e. door to door salespeople) within a private embedded network.
Q5.3 Thinking of your preferred Option, would you like to suggest any improvements?
Q5.4 FEEDBACK WANTED Electric vehicles and powers of entry. Stakeholder feedback is sought on the benefits, disadvantages and risks of classifying electric vehicles connected at premises as part of an electrical installation for the purposes of entry. Blank (I have no interest in providing feedback) Q5.4 Please provide your feedback below

Topic 6 Technical requirements
Q6.1 Of the Options considered for this Topic, which one do you prefer? Q6.2 Why? Q6.3 Thinking of your preferred Option, would you like to suggest any improvements? It is important that any changes made in relation to technical requirements do not add significant unnecessary burden to those individuals and businesses that are looking to innovate or use new technology to reduce their energy costs. Q6.4 FEEDBACK WANTED Electric vehicles and network connection agreements. Stakeholder feedback is sought on the advantages, disadvantages and risks of requiring electric vehicle owners to seek network approval under the Electricity Act to install an electric vehicle charger which is configured to export, or to otherwise inform the network of their purchase. Blank - I have no interest in providing feedback Q6.4 Please provide your feedback below

Q6.5 FEEDBACK WANTED Electric vehicles and definition of electrical installation. Stakeholder feedback is sought on the advantages, disadvantages and risks of extending the definition of electrical installation to electric vehicles. I would like to provide feedback Q6.5 Please provide your feedback below Electric vehicles are more like an electrical appliance (think TV or refrigerator) than an electrical installation as they can be plugged in and removed. While they might require more power than a traditional appliance, they still remain an appliance. Should the definition of electrical installation extend to electric vehicles it would open the door for this to continue to extend to other electric devices (electric golf buggies, scooters etc), at which point does an electric vehicle or other electrical appliance become an appliance rather than an electrical installation. Q6.6 FEEDBACK WANTED Excluded customers. Stakeholder feedback is sought on the whether any adjustment may need to be made to either the National Energy Retail Law (Queensland) or the definition of excluded customer in the Electricity Act to account for new technology (e.g. solar and batteries) or new stand-alone power systems (noting the Australian Energy Market Commission is also considering this issue). Blank - I have no interest in providing feedback Q6.6 Please provide your feedback below

Q6.7 FEEDBACK WANTED Electric vehicles charging stations and technical regulation. Stakeholder feedback is sought on whether the framework for technical standards under the Electricity Act should apply to electric vehicle charging stations. Blank (I have no interest in providing feedback) Q6.7 Please provide your feedback below

Topic 7 Price control
Q7.1 Of the Options considered for this Topic, which one do you prefer?
I do not like any of the options

Q7.2 Why?
While choice for large business customers in regional areas was seen as a positive outcome, the reality has been that many of these customers went ‘on-market’ on the basis of extremely good deals. Once their first contract neared its expiry and they were required to recontract the new offer was no better, and in some cases worse, than the offer that they had from Ergon however once they had gone ‘on-market’ they had no ability to return to Ergon. Our members have noted the complexity of the offers provided to them mean that in many cases they have had to engage an external contractor to negotiate on their behalf and to explain the complex contract. As embedded networks, these businesses are required to comply with multiple levels of regulation (State and Federal) and the lack of certainty is a significant challenge when running their business. Many caravan parks that use over 160mWh across the year are running embedded networks and charge their residents for electricity based on their meter reading. In doing this they must comply with the AER guidelines and the Manufactured Homes (Residential Parks) Act 2003 and/or the Residential Tenancies and Rooming Accommodation Act 2008. While an apartment block or retirement home would be charged the residential rate by their retailer on the basis that the property is largely residential, a caravan park does not receive this benefit which means that the caravan park must absorb the difference in price and charge their resident only the residential price.

Q7.3 Thinking of your preferred Option, would you like to suggest any improvements?

Q7.4 FEEDBACK WANTED Electric vehicles and price control. Stakeholder views are sought on the advantages, disadvantages and risks of extending price protections to operators of commercial electric vehicle charging stations.
I would like to provide feedback
Q7.4 Please provide your feedback below
Limiting the roadblocks in the installation of electric vehicle charging stations (i.e. for tourism businesses) would encourage competition in the market. The more electric vehicle charging stations in a town the more competition will thrive. By limiting roadblocks to the installation of electric vehicle charging stations and allowing business operators to charge what they believe is fair and reasonable – and what the customer will pay, electric vehicle customers will benefit. With more charging stations available, these customers will the same power of choice that drivers of petrol or diesel cars have, providing prices are clearly advertised. The introduction of price protections will limit the take up of commercial electric vehicle charging stations which may prevent electric cars from being able to drive to regional and remote locations. This in turn would have a negative impact on the tourism sector in Queensland which relies on drive visitation to support regional communities.

Q7.5 FEEDBACK WANTED Retail products, services and innovation. Stakeholder views are sought on the value of building greater flexibility into retail products and services for regional customers to address new technologies, and how this could be achieved.
Blank - I have no interest in providing feedback
Q7.5 Please provide your feedback below

Q7.6 FEEDBACK WANTED Electric vehicles and regional feed-in tariff. Stakeholder views are sought on the advantages, disadvantages and risks of facilitating feed-in tariff payments in regional areas for exports from electric vehicles.
Blank - I have no interest in providing feedback
Q7.6 Please provide your feedback below
Topic 8 Dispute resolution
Topic 8.1 EWOQ: Embedded network customer fee options
Q8.1 FEEDBACK WANTED Stakeholder views are sought on embedded network customer fee options.
Blank - I have no interest in providing feedback
Q8.1.1 What type of energy disputes are likely to arise between exempt sellers and their customers?
Q8.1.2 What dispute resolution mechanisms do embedded network customers currently use in order to have their energy disputes settled? Are customers aware of and successfully using existing mechanisms? Are there any issues with the current mechanisms?
Q8.1.3 Are there any stakeholder groups that the department should consider, and consult with, when assessing potential options for embedded network customers?
Q8.1.4 Is the predicted number of complaints reasonable based on the information available?
Q8.1.5 Do you agree with the proposal for all residential exempt sellers to be automatically deemed to be Energy and Water Ombudsman scheme participants?
Q8.1.6 Do you agree with the proposal NOT to require exempt sellers to pay an annual participation (membership) fee? If not, why.
Q8.1.7 Do you agree that the proposed fees for exempt sellers under Option 3 are fair and reasonable, and proportionate to the level of impact the issue or complaint may have on the exempt seller customer? If not please explain why.
Q8.1.8 Are there any other user-pays fee options the department should consider?
Q8.1.9 Do you see any issues with delaying the implementation of the user-pays fee scheme for at least 12 months in order to gather data to increase awareness and understanding of the Energy and Water Ombudsman services before fees are payable?

Topic 8.2 EWOQ: general
Q8.2.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q8.2.2 Why?
Q8.2.3 Thinking of your preferred Option, would you like to suggest any improvements?

Topic 8.3 Dispute resolution - Regulator
Q8.3.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q8.3.2 Why?
Q8.3.3 Thinking of your preferred Option, would you like to suggest any improvements?

Topic 9 Customer protections
Q9.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q9.2 Why?
Q9.3 Thinking of your preferred Option, would you like to suggest any improvements?

Q9.4 FEEDBACK WANTED Electric vehicles. Stakeholder feedback is sought on the advantages, disadvantages and risks of including electric vehicle customers within the definition of a customer
Blank - I have no interest in providing feedback
Q9.4 Please provide your feedback below

Topic 10 Emergency provisions
Q10.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q10.2 Why?
Q10.3 Thinking of your preferred Option, would you like to suggest any improvements?

Q10.4 FEEDBACK WANTED Operator of last resort (OoLR) and stand-alone power systems.
Stakeholder feedback is sought on the adequacy of ss. 130 and 131 to manage potential issues relating to third party stand-alone power systems, in light of Australian Energy Market Commission stand-alone power systems work.
Blank - I have no interest in providing feedback
Q10.4 Please provide your feedback below

Q10.5 FEEDBACK WANTED Emergency powers. What should be the threshold for an emergency supply declaration? What should be the scope of Ministerial direction powers taking account of Ministerial direction powers in other NEM jurisdiction? Would there be an ongoing need for a restriction regulation?
Blank - I have no interest in providing feedback
Q10.5 Please provide your feedback below

Topic 11 Offences and penalties
Q11.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q11.2 Why?
Q11.3 Thinking of your preferred Option, would you like to suggest any improvements?