

**Submission
No 31**

EMBEDDED NETWORKS IN NEW SOUTH WALES

Organisation: Ethnic Communities' Council of NSW

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Submission to the NSW Committee on Law and Safety's Inquiry into embedded networks in NSW

The Ethnic Communities' Council of NSW (ECCNSW) welcomes the opportunity to provide input into the NSW Committee on Law and Safety's ('the Committee') Inquiry into embedded networks in NSW ('the Inquiry').

Since its formation over 45 years ago ECCNSW has been the peak body for culturally and linguistically diverse (CALD) community members and representative organisations in NSW. The Ethnic Communities' Council of NSW main activities are advocacy, education and community development. It is a member of the Federation of Ethnic Communities Councils of Australia (FECCA) and the Energy Advocacy role represents FECCA in the National Energy Market (NEM). ECCNSW, in its energy advocacy role within the energy market, has undertaken research in-language across a broad spectrum of language and cultural communities over the past decade.¹

ECCNSW has also published a set of guidelines for energy businesses, market bodies and agencies for their engagement with CALD communities, *Cultural Connections: Engaging CALD energy consumers* and its more recent update *Continuing Cultural Connections: CALD best practice in a consumer centric market*.² which includes 13 case studies of innovative and successful CALD community engagement in energy issues.

¹ For research highlights please see:

2012

https://f1ixhmea.dreamwp.com/wp-content/uploads/2020/10/Research_Briefing-1.pdf

2016

https://f1ixhmea.dreamwp.com/wp-content/uploads/2020/10/CALD-Highlights2016_WEB_A4-1.pdf

Small business

<https://eccnsw.org.au/business-energy-smart-tips-best/>

² For *Cultural Connections* please see:

https://f1ixhmea.dreamwp.com/wp-content/uploads/2020/10/Cultural-Connections_Engaging-CALD-Energy-Consumers_WEB-1.pdf

For *Continuing Cultural Connections* please see:

<https://f1ixhmea.dreamwp.com/wp-content/uploads/2020/10/Continuing-Cultural-Connections-WEB7.pdf>

ECCNSW thanks the Committee for the opportunity to contribute to the deliberations on embedded networks in NSW. Firstly, we would like to fully endorse the submission to this Inquiry by the Public Interest Advocacy Centre (PIAC). Most of the recommendations in PIAC's submission resonate with CALD communities and point strongly to areas that need to be addressed in any authentic review of embedded networks in NSW.

PIAC (along with the Energy and Water Ombudsman of NSW (EWON) and the Tenants Union) also point to a number of residency situations where there is a distinct potential for inequity of service provision and harm. This list includes:

- Residents in embedded network apartments being 'locked in' to a single energy provider as a result of a long-term contract with the developer or strata manager
- Residents in embedded networks being unaware the property they have rented or purchased is an embedded network
- Residents in embedded network apartment developments being unable to access an alternative due to the cost of new metering and connections required by the network operator
- Residents in land lease community embedded networks not receiving acceptable, safe, reliable electricity that meets normal standards of supply
- Residents in Land lease community embedded networks not receiving appropriate, regular, consistent and accurate usage and billing information
- Residents in embedded networks being charged inconsistently, excessively, or in a manner that does not align with their usage
- Residents in embedded networks unable to access assistance and payment supports measures from their energy supplier when they need it
- Residents in embedded networks unable to access NSW Government rebates and EAPA vouchers when they are eligible and in need of payment assistance.
- Residents in embedded networks being billed excessively or inconsistently or gas and hot/chilled water
- Residents in embedded networks having inconsistent access to independent dispute resolution

ECCNSW would add to this list those consumers and residents who have a CALD background and speak a language other than English at home.³ CALD communities comprise a considerable (and anecdotally at least, growing) proportion of residents living in apartments by preference and often have their energy (electricity and gas/gas hot water/chilled water) provided through embedded networks.

Small business in NSW has a high CALD representation (possibly >40%) and typically these businesses do not join small to medium enterprise peak bodies. These businesses can be high energy users (hot bread shops, dry cleaners, convenience stores etc). Their businesses are often in shopping centre complexes and often have their energy provided through embedded networks.

As pointed out in the PIAC submission, there is a dearth of information and data available about the number of embedded networks and exempt entities, their type and the consumers they serve. This is especially true for CALD consumers, both domestic and small business. ECCNSW research provides some of the very few insights into CALD

³ Across NSW, more than 22% of the population speaks a language other than English at home. This rises to much higher percentages in large urban areas, sometimes 60-70%

energy use, understanding and communication needs.⁴ Data collection, aggregation and analysis will be an important factor in detailing and addressing consumer needs, both for CALD consumers and the wider population.

Our research with CALD consumers (domestic and small business) has shown that there is little understanding of the complexities of energy provision via embedded networks or any of the possible avenues for assistance in the event they encounter problems with their energy supply or payment options.

ECCNSW research also details the poor take-up of payment assistance options by CALD consumers, either through lack of knowledge of the programs or other cultural norms that preclude seeking assistance from outside organisations not connected to family or their community.

ECCNSW welcomes the opportunity to meet with the Committee and other stakeholders to discuss these issues in more depth.

If you require additional information please contact Iain Maitland, Energy Advocate on [REDACTED] or email [REDACTED].

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⁴ Please see above research highlights in footnote 1. More detail on this research can be provided by ECCNSW if required.