



30 March 2023

Jessica Robinson
Independent Pricing and Regulatory Tribunal NSW
PO Box K35
Haymarket Post Shop NSW 1240

[Lodged online: https://www.ipart.nsw.gov.au/Home/Reviews/Lodge-a-submission?openforms_id=922debf9-0915-463b-bee1-55ae0c82f644&timeline_id=15816&cta_type=have_your_say](https://www.ipart.nsw.gov.au/Home/Reviews/Lodge-a-submission?openforms_id=922debf9-0915-463b-bee1-55ae0c82f644&timeline_id=15816&cta_type=have_your_say)

Dear Ms Robinson

DRAFT TERMS OF REFERENCE – THE FUTURE OF EMBEDDED NETWORKS IN NSW – 1 MARCH 2023

The Caravan, Camping & Touring Industry & Manufactured Housing Industry Association of NSW Ltd (CCIA NSW) is the State's peak industry body representing the interests of over 500 holiday parks and residential land lease communities (residential parks, including caravan parks and manufactured home estates) and over 200 manufacturers, retailers and repairers of recreational vehicles (RVs, including caravans, campervans, motorhomes, camper trailers, tent trailers, fifth wheelers and slide-ons), camping equipment suppliers, manufacturers of relocatable homes and service providers to these businesses.

Many holiday parks and residential land lease communities in NSW have embedded electricity networks serving holiday makers and/or residential customers. Under the Australian Energy Regulator's (AER) *(Retail) Exempt Selling Guideline, Version 5, March 2018* (Retail Guideline) and *Electricity Network Service Provider – Registration Exemption Guideline, Version 6, March 2018* (Network Guideline) our holiday park and residential land lease community members fall within Exemption Classes D3, ND3 and R4, NR4 respectively and must comply with the Conditions relevant to their exemption class.

In representing these businesses, we welcome the opportunity to provide feedback on the draft terms of reference from the NSW Government on the future of embedded networks in NSW.

There is a typographical error on page 1 under the heading 'Context.' The reference to 'lend lease communities' should be a reference to 'residential land lease communities.' Otherwise, the draft terms of reference are comprehensive and should allow IPART to consider all relevant issues.

Thank you for considering our feedback. We look forward to our involvement as IPART's consultation progresses. Should you have any questions or wish to discuss embedded networks in our sector please contact [REDACTED]

Yours sincerely

[REDACTED]

Chief Executive Officer