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Energy Policy WA
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Expert Consumer Panel submission on Electricity Industry (Alternative Electricity Services) Amendment Bill

Dear Ms Woenne,

Thank you for the opportunity to make a submission in response to Energy Policy Western Australia's consultation on the Electricity Industry (Alternative Electricity Services) Amendment Bill.

The electricity and gas sector in Western Australia exists to meet the energy needs and expectations of consumers. It is central to energy production, delivery and services that the long-term interests of energy consumers are served. The Expert Consumer Panel (ECP) was established by the Western Australian Government to provide input on policy, rules and other processes across all aspects of the energy sector. The ECP has a broad membership base with representatives from the social welfare sector, climate movement, former senior energy sector executives and experts, all of whom bring a unique customer perspective to the work of the group.

ECP members are firm proponents of reforms that offer customers protection, transparency, and access to data about their energy bills. We therefore support the proposed *Electricity Industry (Alternative Electricity Services) Amendment Bill* reforms, which give small-use energy consumers more security and access to the Energy Ombudsman. ECP members specifically highlight the significance of these changes in ensuring adequate protection for those who are poor, insecure financially, or who have been the victims of or have survived domestic or family violence. The suggested amendments must include changes that will make it easier for people to pay their electricity bills and maintain connections. We support changes that provide these core consumer protections and are enacted in a cost effective manner. Reforms should, ideally, not impose significant financial burdens on the numerous embedded networks service providers.

The rights of small-use energy consumers to receive timely information, access to their data, and regular invoices are important to ECP members. This knowledge is crucial during a cost-of-living crisis so that consumers can control their energy usage and prevent "bill shock." We suggest that the reforms be expanded to include minimum standards for small-energy consumer bills, standardising the frequency and data made available throughout Western Australia (for example, ensuring alternative electricity services customers are able to access certain information that would otherwise be provided by Synergy and Horizon Power to their customers.).

Small-use energy consumers should have access to, and an option over, purchasing renewable energy as WA decarbonises the grid. We are in favour of the provisions in the *Electricity Industry (Alternative Electricity Services) Amendment Bill* that enable customers of an alternative electricity service provider to access electricity generated by renewable sources where practicable. ECP

members support the proposed changes because they reduce the possibility that some people, organisations, and communities will be left behind as society and the economy move towards a more sustainable and resilient state.

We note that many small-use electricity consumers in embedded networks, for example those residing in caravan parks, aged care facilities or retirement villages, are among the most vulnerable in society. These vulnerabilities extend to financial security, limited income and difficulties advocating on their own behalf. As a result, the reform includes provisions for strong consumer protection and enforceable pricing control, both of which we firmly support.

While outside the scope of the *Electricity Industry (Alternative Electricity Services) Amendment Bill*, ECP members note that the above-mentioned vulnerabilities make written and formal consultation, and communication, with vulnerable small-use energy consumers challenging. Appropriate communication of the reforms and the additional rights conferred to consumers should be the subject of a tailored consumer communication campaign. ECP members would be pleased to engage on this topic at an appropriate time.

ECP members are pleased to support the amendments to the legislation and welcome increased access to consumer protection and support for energy decarbonisation. We would be pleased to provide any further information to support this submission and look forward to continuing to engage with you about these reforms.

Yours sincerely,
WA Expert Consumer Panel