

**Subject:** Feedback on the AES Prescribing Regulations  
**Date:** Tuesday, 13 January 2026 11:43:04 AM

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Dear Western Australia Government,

## Please except my Feedback on Registration Requirements under the AES Framework

Submission from the perspective of a pension-dependent electricity consumer

### **1. Pensioners are uniquely exposed under the current registration framework**

As a recipient of the Age Pension, my ability to afford electricity depends on automatic access to concessions, rebates, and emergency energy relief. These supports rely on clear accountability, recognised billing arrangements, and government-visible supply relationships.

The draft Electricity Industry (Alternative Electricity Services) Regulations 2025 focus primarily on identifying who must register under the AES framework, but they do not adequately consider the consequences for vulnerable consumers when registration is absent, delayed, or avoided through exemptions .

From a pensioner's perspective, registration is not an administrative formality — it is the mechanism through which consumer protections are triggered and enforced.

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### **2. Any entity supplying electricity to pensioners must be required to register**

The draft regulations permit exemptions where electricity is supplied:

- incidentally with other goods or services,

- within limited or private arrangements, or
- through embedded, parent-meter, or on-site power supply configurations.

From a pensioner standpoint, these exemptions are high-risk.

If an entity:

- determines how electricity charges are calculated,
- controls or issues electricity billing, or
- sits between a pensioner and a licensed electricity retailer,

then that entity must be required to register under the AES framework, regardless of scale, ownership structure, or characterisation of the supply as “incidental”.

Exemptions based on provider convenience, scale, or business structure shift risk onto income-vulnerable consumers who lack the financial capacity to absorb billing errors, delays, or loss of concessions.

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### **3. Registration must be compulsory where concession access may be affected**

The draft regulations do not explicitly link registration requirements to the protection of government concessions and rebates.

For pensioners, this omission is critical.

Where an electricity supply arrangement:

- alters billing formats,
- disrupts automatic concession application, or
- removes the customer from standard retailer systems,

registration must be mandatory.

Without registration:

- government agencies may not recognise the supply arrangement,
- concessions may not be applied automatically, and
- pensioners may be excluded from one-off cost-of-living or emergency energy payments.

From a pensioner's perspective, any supply model that places concession delivery at risk must fall squarely within the registration framework.

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#### **4. Deferring protections to a future Code of Practice is inadequate**

The draft regulations repeatedly defer substantive consumer protections to a Code of Practice that has not yet been finalised.

For pension-dependent consumers, reliance on future instruments or transitional assurances is insufficient.

Registration rules should not be operational before enforceable protections for concession recipients are in place. Allowing unregistered or lightly regulated supply during transition periods exposes pensioners to immediate and irreversible financial harm.

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#### **5. Registration thresholds must be based on consumer impact, not provider structure**

From a pensioner perspective, registration should be required wherever:

- electricity is supplied to residential customers, and
- the arrangement affects billing, concession eligibility, or access to government support.

Whether the supplier is a landlord, strata body, developer, or OPS operator is irrelevant.

What matters is the impact on the end consumer.

If an arrangement has the capacity to interfere with how a pensioner receives electricity concessions or relief, registration must be compulsory.

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## **6. Personal impact (pensioner perspective)**

As an Age Pension recipient, a substantial proportion of my income is already committed to essential living costs. Government policy actively encourages older Australians to age at home, yet this is only viable if utilities remain affordable and concessions are delivered automatically. I am moving into a new, more affordable estate that includes embedded energy and on-site power arrangements because conventional housing options are no longer financially accessible. These newer, multi-generational and master-planned estates are precisely where AES and OPS models are most likely to operate. If registration requirements are weak or exemptions too broad, pensioners risk losing access to concessions and relief payments at the very point where government policy relies on those supports to keep older people housed, independent, and out of institutional care.

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## **7. Recommendations**

I urge Energy Policy WA to amend the prescribing regulations so that:

1. Any entity supplying electricity to residential pensioners is required to register under the AES framework, without exemptions based solely on scale, ownership, or incidental supply.
  2. Risk to concession access is explicitly recognised as a trigger for mandatory registration.
  3. Transitional arrangements do not permit unregistered supply to pensioners before the AES Code of Practice is finalised and enforceable.
  4. Registration is framed as a consumer protection mechanism, not solely as a market-entry or compliance exercise.
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## **Closing statement**

From a pensioner's perspective, the central issue is not who finds registration convenient, but who holds power over whether essential electricity remains affordable.

The AES registration framework must be designed with that reality at its core.