

**Subject:** Submission on the Alternative Electricity Services (AES) Registration Fee Framework  
**Date:** Tuesday, 10 February 2026 4:09:06 PM

---

# **From a Consumer Considering a Solar Embedded / Alternative Electricity System**

Submitted to: Energy Policy WA – Department of Energy and Economic Diversification

Regarding: AES Registration Fees Information Paper (2026)

---

## **1. My Perspective as a Consumer**

I am a Western Australian consumer preparing to enter a solar-based embedded or alternative electricity arrangement. My interest in AES is driven by affordability, resilience, climate outcomes, and the ability to participate in newer energy models that better reflect local generation and consumption.

For consumers like me, AES represents one of the few realistic ways to access innovation and choice within WA's electricity system. That makes the design of this framework critically important. The regulatory structure adopted at the outset will directly influence whether AES becomes an enabler of innovation and consumer benefit, or a constrained niche dominated by larger operators and higher costs.

---

## **2. WA Has a Once-Only Design Opportunity**

Western Australia is in a unique position. Unlike many jurisdictions, WA has retained public ownership of its main electricity system and avoided exposure to international electricity trading volatility. At the same time, WA has enormous untapped potential in distributed solar, storage, and local energy solutions.

AES regulation is therefore not simply about compliance or oversight. It is the mechanism through which WA can responsibly introduce decentralised energy, improve resilience, and expand consumer choice without repeating mistakes made elsewhere.

That makes early design decisions — including how regulatory costs are recovered —

especially important.

---

### **3. Concern With Flat Registration Fees From a Consumer Perspective**

The proposed flat annual registration fee, applied equally to all AES providers regardless of size or complexity, raises concerns for consumers considering embedded or alternative electricity arrangements.

From a consumer perspective, flat fees:

- Disproportionately burden small, low-risk systems
- Encourage consolidation by larger operators
- Increase the likelihood that costs are passed through to end-users
- Reduce diversity and choice in the long term

Consumers in embedded networks typically cannot choose their retailer or easily exit an arrangement. When provider costs increase, they are commonly recovered through tariffs, administrative charges, or bundled pricing. Without careful design, a flat registration fee risks becoming an invisible consumer cost, even though it is formally levied on providers.

---

### **4. International Experience Shows Better Design Is Possible**

As a consumer preparing to participate in an embedded or on-site solar arrangement, I am concerned that the proposed fee model reflects older regulatory approaches that mature jurisdictions have already moved away from.

In the United Kingdom, private wire and on-site supply arrangements are generally managed through licence-exemption pathways and tailored regulatory guidance, with a strong focus on ensuring consumer protections are embedded through obligations rather than blunt, undifferentiated fees. Across the European Union, electricity market reforms increasingly treat participation in decentralised and community-based energy as part of the core system, ensuring full consumer rights while avoiding unnecessary barriers for smaller participants.

The lesson from these jurisdictions is consistent: flat, per-provider fees were found to suppress small-scale innovation, entrench incumbent advantage, and obscure the real drivers of regulatory cost. Where they were retained, they required ongoing correction through exemptions and layered fixes. WA has the advantage of designing its framework

after these lessons are known. Introducing a blunt fee structure at commencement risks replicating outcomes that others have already had to unwind.

---

## **5. Data Uncertainty Should Encourage Proportionate Design, Not Blunt Interim Measures**

The Information Paper acknowledges uncertainty about:

- The number of embedded networks
- The number of affected consumers
- The regulatory effort required for different service types

As a consumer, I accept that new frameworks involve uncertainty. However, uncertainty should encourage caution and proportionality, not a one-size-fits-all interim approach that may distort the market from the outset.

Once embedded systems, pricing structures, and provider models form around an initial regulatory design, they are difficult to unwind. Early simplicity should not come at the expense of long-term consumer outcomes.

---

## **6. Design Adjustments That Would Support Consumers, Innovation, and Climate Outcomes**

To ensure the AES framework supports consumer choice, solar uptake, and innovation, I encourage consideration of the following:

1. Tiered registration fees from commencement, reflecting scale or customer numbers
2. Fee caps or reduced rates for small, low-risk, or community-scale systems
3. Clear transparency requirements so consumers understand how regulatory costs are recovered
4. An early and mandatory review point (within two years)
5. Public reporting linking fees to actual regulatory effort, to build trust and accountability

These measures reflect modern international practice and would help ensure AES regulation enables, rather than constrains, participation.

---

---

## 7. Conclusion

AES regulation is a critical opportunity for WA. For consumers like me, it represents a pathway to solar participation, resilience, and choice within a system that has historically been limited in these areas.

WA has the advantage of strong system control, abundant renewable potential, and the ability to learn from international experience. That advantage should be reflected in a regulatory framework that is modern, proportionate, and designed to support innovation from the outset.

Getting this right now matters. The structure set at commencement will shape consumer outcomes and energy choices in WA for decades.

