

Subject: Submission on Draft Electricity Industry (Alternative Electricity Services) Regulations 2025
Date: Tuesday, 13 January 2026 4:57:46 PM

Dear Energy Policy WA Team,

Thank you for the opportunity to provide feedback on the draft Electricity Industry (Alternative Electricity Services) Regulations 2025.

We welcome the Western Australian Government's intention to establish a clear and proportionate regulatory framework for embedded networks and on-site power supply (OPS) arrangements. We acknowledge that the proposed AES framework seeks to improve transparency, consumer protections, and regulatory certainty as alternative electricity supply models continue to evolve.

From our perspective, the draft regulations represent an important foundational step in addressing emerging business models involving on-site generation, energy storage, and private electricity arrangements within single properties. In particular, we support the Government's objective of ensuring that consumers who access electricity through non-traditional arrangements are afforded appropriate safeguards, while also recognising the need to maintain system integrity and fair market outcomes.

At the same time, we note that the alternative electricity services market in Western Australia remains at an early and developmental stage. Many potential participants, including ourselves, are still assessing commercial feasibility, partnership structures, and long-term investment conditions. In this context, we respectfully encourage the Government to ensure that the final framework preserves sufficient flexibility to accommodate innovation and emerging use cases, particularly where projects are in pilot, pre-investment, or exploratory phases.

We also note that further details regarding the AES Code of Practice and registration fees are expected to be released at a later stage. We consider these elements to be critical to understanding the practical and commercial implications of registration. Accordingly, we support the use of transitional arrangements and clear guidance to assist prospective participants in determining whether and when registration obligations arise, especially for OPS-related arrangements where ownership, control, and consumption rights may vary by project structure.

We appreciate the opportunity to contribute to this consultation and would welcome continued engagement as the AES framework, Code of Practice, and supporting

guidance are further developed. Please do not hesitate to contact us should further clarification or stakeholder input be helpful.

Yours sincerely,

Michael Cheng

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