



15 May 2026

Department of Energy and Economic Diversification
Level 1, 66 St Georges Terrace
Perth WA 6000

Lodged electronically: EPWA-AES@deed.wa.gov.au

Dear Sir/Madam

Draft AES Code of Practice for On-site Power Supply Services Exposure Draft

Origin Energy appreciates the opportunity to provide a submission in response to the Department's Exposure Draft of the Alternative Energy Services (AES) Code of Practice of On-site Power Supply Services (OPS).

Origin Energy provides products and services to both small and large customers in Western Australia through tailored demand management and commercial solutions, including the installation of on-site solar systems and renewable energy contracts. The large business profile continues to expand as more organisations seek renewable energy solutions to support their operational and sustainability objectives.

We believe small customers receiving on-site power supply services should have access to similar protections and regulatory oversight as standard supply customers. This includes access to protections relating to disclosure, hardship, billing, disconnection, contract variation and dispute resolution are important safeguards for residential customers.

However, extending the Code beyond mass market customers to capture large commercial and industrial (C&I) customers will constrain these businesses from engaging in the AES market and reduce the benefits to both consumers and providers.

Large commercial and industrial customers are sophisticated users of energy services. They already enter into highly customised contracts and often engage brokering services to not only source energy contracts from providers, but separate contracts for ancillary services such as solar and batteries. Such agreements may include tailored pricing structures, risk allocation mechanisms, load flexibility provisions and specific supply management arrangements. These are terms that generally do not apply to residential or small business customers.

We note the proposed Code sets out proposed payment plan requirements and variation to pricing requirements¹ that we do not think are appropriate for large customers. Restricting payment plan arrangements or requiring 5 business days notice to a change in price does not recognise the large scale operation of businesses involved in providing and the pricing complexities that could form part of an agreed contract. Applying prescriptive pricing and variation obligations designed for residential customers may interfere with negotiated commercial outcomes and reduce the flexibility required to structure arrangements that reflect the operational and financial needs of large energy users.

We thus believe consumer protections in the AEC Code of Practice for OPS should be limited to small customers where the enhanced consumer protections are most appropriate. This approach would better reflect the differing needs of these customer groups while supporting innovative and competitive energy markets.

Finally, we support harmonisation of regulatory rules across national energy markets. Jurisdiction specific rules create unnecessary complexity and inefficiencies which increases the cost of delivering energy products and services to customers. A consistent national framework supports more efficient operations and enable exempt service providers to focus on delivering competitive and customer-focused products.

If you have any questions regarding this submission, please contact Caroline Brumby in the first instance on [REDACTED].

Yours sincerely

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