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Energy Policy WA
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Alternative Electricity Services (AES) Code of Practice for On-Site Power Supply Services

Thank you for the opportunity to provide feedback on the Draft AES Code of Practice for On-Site Power Supply (OPS) Services (the Draft OPS Code of Practice)

As the Energy Policy WA team is aware, the Shopping Centre Council of Australia (SCCA) and our members have a strong interest in the AES reforms, given SCCA members are owners and operators of embedded network sites at many shopping centres.

While we appreciate the Draft OPS Code of Practice is currently being consulted on is more relevant to the provision of solar energy systems rather than the operation of embedded networks, we provide in our submission a suggestion to improve the clarity of what will become the AES Code of Practice.

We appreciate the willingness of the Government and the Energy Policy WA team in engaging with us on the AES reforms.

Draft OPS Code of Practice

We understand from the *Reading Guide for OPS Obligations* paper that the Draft OPS Code of Practice currently being consulted on will form part of the AES Code of Practice, that will likely also include obligations for embedded networks (to be referred to as single property networks (SPNs)) which will be consulted on separately. However, the Draft OPS Code of Practice as written does not make clear that it is currently only applicable to OPS services.

As the AES Code of Practice will, in effect, include two codes of practice within the same instrument (one for OPS services and one for SPNs), it is important that those subject to elements of the AES Code of Practice can easily and clearly identify the provisions that are relevant to them.

To ensure clarity and understanding across impacted parties, we recommend that the AES Code of Practice include two schedules that respectively relate to OPS services and SPNs, rather than a primary section dealing with OPS services and a schedule for SPNs (as flagged in the *Reading Guide for OPS Obligations*).

Further, to support greater understanding of these new definitions, we recommend that an explanatory note be included in the AES Code of Practice to explain, by way of example, what an OPS service is and what an SPN is.

Recommendation 1 The AES Code of Practice be comprised of the following two schedules:

- **Schedule 1 – On-Site Power Supply Services**
- **Schedule 2 – Single Property Networks**

Recommendation 2 The AES Code of Practice include an explanatory note that provides examples of an OPS service and an SPN.

Next Steps

In anticipation of the foreshadowed consultation on the provisions of the AES Code of Practice that will apply to SPNs, we take also take this opportunity to reiterate the feedback we've provided in previous consultation stages, including most recently in our submission on the Draft *Electricity Industry (Alternative Electricity Services) Regulations 2025*.

We look forward to continuing to engage with the Energy Policy WA team and on further consultation stages.

Sincerely,

Oliver Everett

Senior Advisor
SCCA

Proposed new regulation [XX] – Review of Regulations**18. Statutory review**

- (1) The Minister must cause a review of the operation and effectiveness of these Regulations to be undertaken as soon as practicable after the period of 2 years beginning on the day on which these Regulations come into operation.
- (2) The review must consider —
 - (a) whether the cost of the regulatory framework established under these Regulations, including the AES Code and any fees, is proportionate to the benefits associated with the provision of alternative electricity services,
 - (b) the effectiveness and ongoing necessity of dispute resolution arrangements, including the requirement for certain AES providers to be members of the Ombudsman scheme; and
 - (c) whether these Regulations have resulted in improved customer outcomes, having regard to evidence of operational issues by AES providers, complaints, disputes and enforcement activity.
- (3) The Minister must cause a report of the review to be laid before each House of Parliament within 12 months after the review is commenced.