Sent: Tuesday, 22 September 2026 5:16 PM
To: EPWA Alternative Electricity Services
Cc: Members – Caravan & Camping WA
Subject: Caravan & Camping WA – Feedback on Draft AES Code of Practice for Single Property Networks

Good afternoon,

Thank you for the opportunity to provide feedback on the Draft Alternative Electricity Services Code of Practice for Single Property Networks.
As the peak industry body representing more than 140 caravan park operators across Western Australia, we welcome the opportunity to provide an industry perspective on the proposed Single Property Network requirements.

Our members already operate within established regulatory frameworks, including the *Caravan Parks and Camping Grounds Act 1995* and associated Regulations and, for long-stay arrangements, the *Residential Parks (Long-stay Tenants) Act 2006* and associated Regulations.

Our feedback is focused on ensuring the new AES requirements are clear, practical and proportionate, and that caravan park operators can readily understand how the new framework interacts with their existing obligations.

Please see our feedback below for consideration. We welcome any further discussion or clarification as the framework is finalised.

Draft Framework Reference	Impact	Recommendation
Reading Guide – Sections 2.1–2.2: SPNs and SPN AES. All private electricity networks on a single property are SPNs, although not all will necessarily need to register under the AES framework.	Caravan parks can have different types of customers on the same property – for example, holidaymakers, people staying for longer periods and long-stay residents. It is not clear enough which of these customers and electricity arrangements will be covered by the new rules.	Provide simple caravan park examples showing who is covered by the AES rules and who is not, including short-stay guests, longer-term visitors, and long-stay residents.
Exposure Draft – Schedule 1, Item 9, p.47: Customers in long-stay parks. The Draft Code recognises customers with agreements under the *Residential Parks (Long-stay Tenants) Act 2006* and the existing limit on daily electricity supply charges.	Long-stay residents already have rules about what a park can charge them for electricity. The new AES rules will sit alongside those existing rules. Park operators need to know which rules to follow and make sure complying with one set of rules	Provide clear guidance showing how the AES electricity charging rules work with the existing Residential Parks rules, using a simple long-stay park example.

Draft Framework Reference	Impact	Recommendation
	does not cause a problem under the other.	
Exposure Draft – Division 3, Clause 17, p.12: Installation of meter. The AES Code generally requires a meter but allows some existing unmetered electricity supplies to continue after 1 July 2027. The *Caravan Parks and Camping Grounds Regulations 1997* already require long-stay sites to have a separate electricity meter.	We want to understand when the AES exception for an existing unmetered site could apply in a caravan park, given that long-stay sites are already required to have their own meter.	Clearly explain how the AES metering rules work with the existing Caravan Parks requirements, including examples of when an existing unmetered site can continue and when a meter is required.
Exposure Draft – Division 4, Clauses 23–25, pp.16–18: Tariffs and prices. The Draft Code sets rules for standard and special electricity tariffs.	Long-stay parks already have rules limiting what residents can be charged for electricity. It is difficult to see from the Draft Code how the new AES tariff rules and the existing long-stay park charging rules fit together.	Provide a worked example showing what a long-stay resident can be charged for electricity under the new AES rules, while also meeting the existing Residential Parks requirements.
Exposure Draft – Clauses 12–15: SPN agreements, pricing, and charging. SPN providers must have an agreement with customers containing certain information and must follow requirements for prices, fees, and charges.	Long-stay Park operators already have agreements and documents they must provide to residents. We want to avoid operators having to create another separate agreement if the required AES information can simply be added to existing documents.	Allow the required AES information to be included in an existing long-stay agreement or as a standard attachment, rather than requiring another separate agreement where this is not necessary.
Exposure Draft – Divisions 6–10, pp.30–40: Hardship, family violence, disconnection, complaints, and life support. These sections introduce a number of customer protection requirements.	We support these protections. However, caravan park operators are primarily running accommodation businesses, not electricity businesses. For smaller parks, developing new policies and understanding the processes could be difficult and time-consuming.	Provide ready-to-use templates and simple step-by-step guidance that parks can adopt, rather than expecting each operator to develop their own policies and processes from scratch.
Exposure Draft – Division 9, Clauses 50–51, pp.37–38: Complaints and dispute resolution. Providers must have a complaints process and small-use customers may take electricity complaints to the Energy and Water Ombudsman.	Long-stay residents already have ways to raise disputes under the Residential Parks framework. It may not always be obvious whether a complaint should be dealt with as an electricity complaint or a residential parks matter.	Provide a simple guide explaining where a park operator or resident should go with different types of complaints, particularly where the issue involves both electricity and a long-stay agreement.

Warm Regards

General Manager Operations & Events

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