SUBMISSION TO THE DEPARTMENT OF ENERGY AND ECONOMIC DIVERSIFICATION

19 SEPTEMBER 2026

Alternative Electricity Services Code of Practice 2027

Single Property Networks, DER access and the State Electricity Objective

KEY RECOMMENDATIONS

1. Give practical effect to the State Electricity Objective by requiring SPN service providers not to unreasonably refuse or materially restrict customer-owned solar PV, batteries or EV charging.

2. Require EV charging limits, additional charges, capital contributions and DER export restrictions to be objectively justified, proportionate, transparent and, where relevant, cost-reflective.

3. Ensure existing customers receive DER and EV information, can access available interval data, and are not locked into tariff arrangements that unnecessarily impede electrification.

About Electrify Everything WA

Electrify Everything WA (EEWA) is a volunteer, not-for-profit organisation advocating for widespread and equitable electrification of Western Australian households, businesses and transport to reduce energy costs and emissions.

EEWA supports the transition from voluntary arrangements to enforceable protections for customers supplied through Single Property Networks (SPNs). Our principal concern is whether the proposed Code provides sufficient protection for customers seeking to electrify their homes and reduce their greenhouse gas emissions through distributed energy resources (DER), including solar PV, batteries and electric vehicle (EV) charging.

The Electricity Industry Act 2004 requires the AES Code to be consistent with the State Electricity Objective (SEO). The SEO expressly includes the long-term interests of consumers in relation to the environment, including reducing greenhouse gas emissions, alongside price, safety, security and reliability.[1]

EEWA considers residential electrification to be a central practical means by which households can reduce their contribution to greenhouse gas emissions. Replacing fossil-fuelled transport and household energy use with electricity, particularly where supported by rooftop solar, batteries and flexible demand, allows individual consumers to make legitimate and material emissions reductions through decisions taken at the household level.

The regulatory treatment of SPNs therefore has consequences beyond electricity billing and conventional consumer protection. An SPN provider can exercise effective control over whether a customer is able to install solar PV, a battery or an EV charger, whether customer generation can be exported, and the conditions and costs attached to those activities. For customers who cannot choose an alternative electricity network, these decisions can determine whether practical household electrification is available to them at all.[3]

1. State Electricity Objective, residential electrification and SPN provider discretion

The draft Code recognises this issue by requiring SPN providers to disclose whether customers may install DER and the restrictions that may apply. Disclosure alone, however, is insufficient. A

framework under which an SPN provider may simply disclose that solar PV, batteries or EV charging are prohibited still allows the provider to become a de facto gatekeeper to legitimate consumer action to reduce greenhouse gas emissions.[2]

EEWA does not suggest that customers should have an unrestricted right to connect DER irrespective of electrical safety, network capacity, reliability or legitimate technical constraints. Those matters are themselves consistent with the SEO and must be appropriately managed.

They should not, however, allow an SPN provider to determine whether customers can participate in electrification solely according to commercial preference, cost avoidance or administrative convenience. Nor should the structure of a customer's electricity supply determine whether that customer is able to take reasonable action to reduce their personal energy costs and carbon emissions.

The distinction is important. The legitimate role of an SPN provider is to manage the electricity service safely, reliably and efficiently. It should not extend to determining, without objective justification, whether customers may participate in the residential energy transition contemplated by the broader statutory framework.

EEWA therefore recommends that the final AES Code expressly provide that an SPN service provider must not unreasonably refuse or materially restrict a customer request to install or upgrade customer-owned DER, including solar PV, batteries and EV charging equipment. Access should be provided on terms commensurate with the State Electricity Objective, subject to objectively justified safety, technical, capacity and operational constraints.

2. Reasonable access to solar, batteries and other DER

A reasonable-access requirement can preserve legitimate SPN constraints. Relevant considerations may include electrical safety, available capacity, protection and power-quality requirements, common-property constraints, export limits, dynamic operating requirements and reasonable connection or augmentation costs.

Where a requested installation cannot be accommodated in the form proposed, the provider should be required to identify the constraint and, where reasonably practicable, identify a compliant alternative. For solar PV, for example, a zero-export or dynamically export-limited arrangement may address a genuine export constraint without requiring the installation itself to be refused.

EEWA recommends that refusal or material restriction of DER require written reasons identifying the relevant safety, technical, capacity or operational basis, and that reasonably available alternatives be considered before access is refused.

3. Electric vehicle charging

Home charging is an important component of transport electrification. The draft Code recognises separately metered EV supply and allows a provider to limit EV supply after prior written notice. It also permits a fixed daily supply charge for separately metered EV supply, subject to the tariff A1 additional-dwelling limit.[2]

EEWA supports managed EV charging. Dynamic load management can allow substantially greater EV charging penetration within existing electrical capacity and can defer unnecessary augmentation. However, prior notice alone is not an adequate test for a restriction. A limitation should be reasonable and proportionate to an identifiable safety, capacity or operational requirement.

EEWA recommends that EV charging restrictions be reasonable, proportionate and technically justified, while expressly preserving dynamic load management and other

managed-charging arrangements as preferred alternatives to refusal where they can address the relevant constraint.

EV charging charges and capital contributions

The draft disclosure framework contemplates a capital contribution for EV connection and metering arrangements. Clause 26 also allows separately metered EV supply to attract an additional fixed daily charge.[2]

There may be legitimate incremental costs associated with a dedicated meter, billing arrangement or electrical works. Those costs should not create a general opportunity to impose additional charges simply because the load is an EV charger. This is particularly important in strata schemes, where an early EV adopter may otherwise be required to fund infrastructure that creates substantial capacity or value for later users or for the SPN generally.

EEWA recommends that additional EV charges and capital contributions be reasonable, transparent and cost-reflective. Where infrastructure provides shared or future capacity, the Code should require a reasonable allocation of common costs rather than placing the full cost on the first customer seeking access.

The Code should also clarify that EV charging supplied behind a customer's existing premises meter does not become a separately chargeable EV supply merely because the electricity is used to charge a vehicle.

4. Export from customer-owned DER

Schedule 1 allows the provider to specify that customer-generated electricity cannot be exported, may be exported without compensation, or may be exported subject to a feed-in tariff.[2]

EEWA supports clear disclosure of these arrangements. However, the same distinction between disclosure and substantive protection applies. Export restrictions may be justified by network capacity, protection or power-quality constraints; they should not be imposed solely because doing so is commercially or administratively convenient.

This issue is particularly relevant where customer exports can be consumed elsewhere within the SPN or reduce electricity purchased through the parent connection. In those circumstances the treatment of exported energy should be transparent.

EEWA recommends that an SPN provider not unreasonably prohibit or restrict export from customer-owned DER. Where export is constrained, the provider should disclose the technical or operational basis. Where export is accepted without compensation, the treatment of that electricity within the SPN should be disclosed to the customer.

EEWA is not proposing that the AES Code establish a mandatory feed-in tariff. The objective is to ensure that export restrictions and settlement arrangements are transparent and have a reasonable basis.

5. Existing customers, interval data and tariff flexibility

The new disclosure requirements principally apply to agreements entered from 1 July 2027. Existing customers receive the prescribed disclosure information only on written request. As a result, many existing residents may not receive information about solar, batteries, EV charging or export arrangements unless they already know to request it.[3]

EEWA recommends a one-off DER and EV information notice for existing residential SPN customers. This need not require re-issue of the complete prescribed disclosure statement.

Interval data

The Reading Guide notes that the previous ability for a customer to request an interval meter has been removed. The draft instead requires information about the installed meter, other meter types that could be installed and the associated cost. The Code also provides access to retained billing data.[2][3]

Where an interval-capable meter already records interval consumption, access to that information supports tariff assessment, battery sizing, load shifting and managed EV charging without requiring additional network infrastructure.

EEWA recommends that, where interval data is available to the SPN provider, customers have reasonable access to their own data in a practical machine-readable format.

Special tariffs

The draft generally prevents a customer who voluntarily opts into a special tariff from opting out for 36 months. The Reading Guide identifies this as a change from the Voluntary Embedded Networks Code, under which a customer could opt out at any time.[3]

A three-year period may span material changes in a household load profile, including acquisition of an EV, installation of a battery or solar PV, or replacement of gas appliances with efficient electric alternatives. A tariff selected before those changes may become inappropriate and may itself impede electrification.

EEWA recommends an earlier exit mechanism where a material change in customer electricity requirements, including significant electrification or DER installation, makes the existing special tariff unsuitable. Reasonable notice and safeguards against repeated switching could apply.

Conclusion

EEWA supports the proposed AES Code and the establishment of enforceable protections for customers within Single Property Networks. The draft also appropriately recognises solar PV, batteries and EV charging as important components of electricity supply within SPNs.

The principal weakness is that the draft generally regulates disclosure of DER access and restrictions rather than the reasonableness of the underlying decisions. This is significant because section 59X(2A) requires the AES Code to be consistent with the State Electricity Objective, including its environmental limb concerning reduction of greenhouse gas emissions.[1]

SPN providers should retain the ability to manage genuine safety, reliability and capacity constraints. They should not, however, be able to determine whether customers can participate in electrification solely according to commercial preference, cost avoidance or administrative convenience. The final Code should ensure access to DER, solar PV and EV charging on terms commensurate with the SEO.

A reasonableness framework would preserve necessary technical controls while ensuring that private network arrangements do not become an avoidable barrier to the State's electricity and emissions objectives.

Submission approved by the EEWA Management Committee by circular resolution.

Sources consulted

[1] Government of Western Australia, Electricity Industry Act 2004 (WA), section 3A (State electricity objective) and section 59X(2A) (AES code of practice must be consistent with the State electricity objective). Source

[2] Department of Energy and Economic Diversification, Exposure Draft - Alternative Electricity Services Code of Practice 2027, August 2026.

[3] Department of Energy and Economic Diversification, Reading Guide - Single Property Networks AES, August 2026.

[4] Department of Energy and Economic Diversification, Customer information on proposed new Single Property Network protections, August 2026.