Sent: Tuesday, 15 September 2026 2:55 PM
To: EPWA Alternative Electricity Services
Subject: Feedback on proposed Alternative Energy Services Code of Practice 2027

This submission is from Cluster 5B of the Witchcliffe Eco Village in Witchcliffe WA. This cluster is a subdivision of 20 lots. Each of the buildings on each lot is to be installed with a solar inverter/battery system. The electricity connection for each lot is to the Clusters Microgrid (Single Property Network) which has a single connection to the outside world (Western Power). Housing construction is currently underway for this cluster, with only five houses completed at this time. Due to the high efficiency house designs that are mandated, plus each lot having solar and its own battery, it's expected that imported energy will be minimal and for a significant part of the year for energy to be a net export. Each lot has its own NMI meter for recording of imported and exported energy. They have to be manually read. There is also a meter at the Western Power connection that is used by the energy company to invoice the Strata Company. The Strata Company for the Cluster owns all the common facilities, and this includes the Single Property Network. The Strata Council which manages the Strata Company consists of elected representatives from the cluster community. The Strata Company invoices the lot owners on a quarterly basis for the various Strata services, and this includes recouping the energy costs from the electricity provider.

Comments on the proposed Alternative Energy Services Code of Practice 2027are as follows:-

SPN Agreement and the Customer

I quote this paragraph from the Reading Guide single Property Networks AES.
"It should be noted that an SPN agreement can form part of a lease and can also be, if the customer is a resident in a strata titles scheme or community scheme, the by-laws that apply to the customer as a resident of the scheme. Stakeholders should note that this does not preclude a strata company SPN provider using a formal SPN agreement with each customer."

The Code of Practice treats a Customer as an individual yet the Reading Guide allows for the Customer to be treated as a group if they are residents of a strata scheme. The Code of Practice wording needs to be adjusted to reflect that of the Reading Guide.

32. Issue of Bills
The default billing period is "at least once every 2 months". A period of 3 months would be more reasonable. For our Strata Cluster, electricity could then be integrated in with the other Strata invoicing allowing for potential electricity credits (excess solar) to offset other Strata expenses. As household meters have to be manually read and everything done by volunteers, a longer period is reasonable.

Regards