Sent: Friday, 25 September 2026 11:30 AM
To: EPWA Alternative Electricity Services
Subject: Submission on Alternative Electricity Services – AES framework

Good morning,

As a managing agent responsible for properties operating Single Property Networks (SPNs), we support the intent of the proposed Alternative Electricity Services Code of Practice and the objective of improving transparency and consumer protections within embedded electricity networks. However, several provisions of the draft Code do not adequately reflect the operational and commercial realities of managing commercial properties and may result in disproportionate compliance obligations and costs.

We strongly support the development of separate Codes of Practice for commercial and residential consumers. Commercial tenancies operate under fundamentally different contractual arrangements, risk profiles and customer relationships than residential settings. A dedicated commercial Code would provide more appropriate regulatory oversight while avoiding unnecessary administrative burden.

We also recommend that the implementation date be linked to the publication of the final Code rather than the currently proposed commencement date of 31 July 2027. Stakeholders are being asked to prepare for compliance with a document that remains in draft form, without certainty regarding its final content or release date. A minimum 12-month transition period following publication of the final Code would provide sufficient time to review processes, contractual arrangements and operational systems.

In addition, we encourage reconsideration of several provisions that may have unintended consequences. The requirement to provide paper statements at no cost does not reflect contemporary business practices and operators should be permitted to recover reasonable costs where hard-copy statements are requested. The Code should also ensure there are no restrictions on dynamic load management of electric vehicle charging infrastructure, which is essential for safely operating multiple chargers within commercial buildings.

The draft Code should further provide a mechanism that allows SPN operators to recover their reasonable operating and compliance costs. Where regulated tariffs would require electricity to be supplied below cost, operators should be permitted to recover their average electricity procurement cost together with a modest administrative margin that reflects the ongoing costs of operating and maintaining the network.

Consideration should also be given to introducing a consumption-based exemption threshold so that smaller and less complex networks are not subjected to the same level of regulatory burden as larger operations. Finally, where tenant requests require specialist engineering advice or technical investigations, the Code should allow recovery of reasonable costs and ensure obligations remain proportionate and practical.

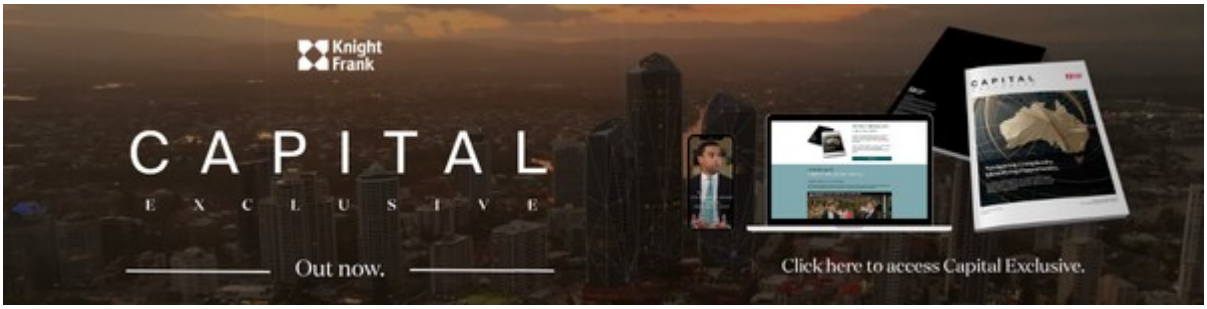
Accordingly, we respectfully recommend:

- Separate Codes of Practice for commercial and residential consumers.
- An implementation date linked to publication of the final Code, with an appropriate transition period.
- Removal or amendment of the requirement to provide paper statements at no cost.
- Explicit recognition of dynamic load management for EV charging infrastructure.
- A transparent cost-recovery mechanism for SPN operators.
- Introduction of a consumption-based exemption threshold for smaller networks.

- Rebalancing provisions require significant technical due diligence and tenant support activities.

We appreciate the opportunity to provide feedback and encourage continued consultation with industry participants as the Code is finalized.

Thanks
Regards,
Jani



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