PKTR Energy AI Pty Ltd

25 September 2026

Alternative Electricity Services Team
Energy Policy WA
Department of Energy and Economic Diversification

Feedback on Exposure Draft Alternative Electricity Services Code of Practice 2026

Single Property Networks

Dear Alternative Electricity Services Team,

PKTR Energy AI welcomes the opportunity to provide feedback on the Exposure Draft Alternative Electricity Services Code of Practice 2026 relating to Single Property Networks.

PKTR Energy AI is a Western Australian metering, meter data, engineering and technology provider supporting embedded and private electricity networks. Our services include metering, remote data collection, meter data validation, commissioning, billing support, software development, system integration and renewable energy monitoring.

We are supportive of the overall direction of the proposed AES framework and believe it represents an important step towards improving customer protection, transparency, data integrity and accountability across Single Property Networks in Western Australia.

From our perspective as a third party technical service provider, successful implementation will require not only appropriate customer protections, but also reliable technical infrastructure, accurate meter data, appropriate digital records and clearly defined responsibilities between the registered SPN provider and the third parties supporting that provider.

1. Customer protection and accountability

PKTR strongly supports the customer protection principles contained within the proposed Code.

Customers within an SPN should have confidence that their electricity consumption is being accurately measured, their bills can be substantiated, tariffs are transparent and appropriate protections exist when something goes wrong.

We particularly support the proposed requirements relating to customer disclosure and SPN agreements, transparent tariffs, accurate metering, minimum billing standards, controls around estimated billing, undercharging and overcharging, hardship and family violence protections, life support customers, disconnection and reconnection protections, and complaints and dispute resolution.

We believe these protections will improve customer confidence in SPNs and establish more consistent standards across the industry.

2. Energy and Water Ombudsman and third party providers

PKTR strongly supports the requirement for registered AES providers supplying small use customers to become members of the Energy and Water Ombudsman WA Scheme.

We understand that the existing Energy and Water Ombudsman WA Scheme will provide independent dispute resolution for small use customers of registered AES providers.

As a third party metering and meter data provider, PKTR would appreciate clarification regarding how third party providers will interact with this process.

Where a complaint relates specifically to meter accuracy, meter configuration, meter data, remote communications, customer to meter allocation or billing data supplied by a third party, will the Ombudsman communicate solely with the registered SPN provider, or will there be a mechanism for the relevant technical provider to participate directly and provide technical evidence?

We would also appreciate clarification as to whether third party meter data, metering and billing providers that are not themselves the registered AES provider will be permitted or expected to become members of the Energy and Water Ombudsman WA Scheme.

Compliance, transparency and customer protection are paramount to PKTR. We believe clearly defined accountability throughout the service chain will strengthen the AES framework.

We also request confirmation of the Ombudsman information that providers will ultimately be required to publish in customer documentation, complaints procedures and digital channels. Will providers use the existing Energy and Water Ombudsman WA contact details and complaint pathway, or will dedicated AES contact details or processes be established prior to SPN commencement?

3. Registration requirements and digital asset registers

A number of our customers are likely to request PKTR assistance with preparing for AES registration. We therefore encourage DEED and the ERA to provide information regarding registration requirements as early as possible.

In particular, will an SPN provider be required to submit or maintain a technical asset and network register as part of its registration or ongoing compliance obligations?

From an operational perspective, we envisage an effective digital SPN register establishing a relationship such as:

Site → Parent Meter → Child Meters → Meter Serial Numbers → Customer or Supply Address → Tariff → SPN Agreement → Billing Account

Will registration require information such as SPN address and responsible entity, parent meter details, child meter details, meter make and model, serial numbers, customer or supply address, meter communication capability, network diagrams, meter commissioning information, applicable tariffs, SPN agreements, billing accounts, solar systems, batteries, EV charging infrastructure, remote communication arrangements and the organisations responsible for metering, data and billing?

If this information will ultimately be required, early guidance would allow industry to begin establishing appropriate digital records now rather than retrospectively collecting and verifying substantial technical information immediately before registration.

4. Metering accuracy and data integrity

PKTR strongly supports the increased emphasis on metering accuracy and data integrity.

Accurate metering and reliable meter data are fundamental to customer protection and accurate billing.

In our view, a customer bill should ultimately be traceable through the following process:

Customer Bill → Applicable Tariff → Validated Consumption Data → Meter → Supply Address

There should be a clear expectation that the data supporting customer billing is accurate, traceable and auditable.

We therefore support strong industry practices around meter commissioning, verification that meters are connected to the correct supply address, meter configuration, meter to customer mapping, data collection, data validation, missing data identification, abnormal consumption detection, exception management, controlled estimation where permitted and retention of records used to produce customer bills.

We would welcome clarification as to whether DEED intends to establish minimum meter data validation, retention and audit trail expectations under the AES framework.

5. Meter accuracy testing and occupancy and vacation reads

PKTR supports the requirement for accurate metering and the requirement to read meters when a customer first occupies a supply address and when they vacate.

We would appreciate further clarification on how these requirements are intended to operate in practice, particularly for legacy meters.

Will DEED establish a defined standard or acceptable methodology for demonstrating meter accuracy? Will existing meters require periodic physical accuracy testing, or will testing primarily occur where meter accuracy is questioned? Will there be prescribed accuracy tolerances, testing equipment requirements, competency requirements and record keeping requirements?

Where a remotely communicating digital meter is installed, can a verified and time stamped remote meter reading satisfy the requirement for an occupancy or vacation reading without requiring a physical site visit?

Where a legacy non communicating meter is installed, will a physical meter read be required for each change of occupancy?

This distinction could have significant practical consequences for shopping centres, apartment developments and other SPNs with large numbers of customers.

If repeated physical meter reads, testing or manual intervention are necessary to maintain compliance, we suggest this should also be considered when assessing whether a legacy meter should transition to a remotely readable digital meter.

We therefore ask whether verified remotely collected meter data will satisfy occupancy and vacation meter reading requirements, what evidence must be retained to demonstrate the validity of those readings, and whether repeated requirements for manual meter reading or testing will be considered as factors supporting transition from legacy meters to remotely readable digital meters.

6. Time of use tariffs and remotely read interval metering

PKTR supports the ability for customers to access special tariffs, including time of use tariffs.

We believe time of use pricing will become increasingly relevant as Western Australia continues to integrate rooftop solar, batteries, electric vehicles and other distributed energy resources.

However, the transparency of a time of use tariff depends heavily on the quality and granularity of the underlying metering data.

Where a customer participates in a time of use tariff, we recommend consideration be given to requiring or strongly encouraging a remotely readable interval meter capable of accurately recording consumption across the applicable tariff periods.

If a customer is being charged differently depending on when electricity is consumed, both the customer and the SPN provider should have access to reliable interval information capable of demonstrating how those charges were calculated.

7. Removal of the customer ability to request an interval meter

PKTR notes that, following stakeholder feedback, the draft has removed the ability for a customer to request an interval meter. It has also removed the requirement to provide customers with physical access to the meter for the purpose of reading it.

We believe the interaction between these changes warrants further consideration.

We understand the reasoning for not requiring an SPN provider to replace an otherwise compliant meter simply because a customer requests a particular technology. However, there are circumstances where interval metering can provide a significant customer benefit, particularly where the customer is participating in a time of use tariff, has solar, battery or EV infrastructure, wishes to investigate abnormal consumption or requires greater visibility over their energy use.

If customers no longer have a general ability to request an interval meter and are not necessarily provided physical access to their existing meter, we ask what mechanism will ensure customers have meaningful access to the consumption information supporting their bills.

We suggest consideration be given to circumstances where an interval meter should be required or made available, including where a customer elects to use a time of use tariff, interval data is necessary to support solar, batteries or EV charging, repeated estimated or manual reads are required, there is an ongoing consumption dispute, an existing meter requires replacement, the meter reaches end of life, or the SPN undergoes a substantial electrical upgrade.

We therefore ask what mechanisms will ensure customers have appropriate access to their consumption information, particularly where they participate in time of use tariffs.

8. Incorrectly wired or inaccurate meters

PKTR strongly supports the proposed requirement that where testing identifies that a meter is not accurately measuring electricity consumption, or is incorrectly wired to the customer supply address, the SPN provider must rectify the issue.

Correct meter to customer mapping is essential for both billing accuracy and customer protection.

We would appreciate clarification regarding the evidence expected to demonstrate that the meter is correctly associated with the customer supply address. Would DEED consider recognised commissioning records, load testing, meter serial verification, photographic records and digital meter to tenancy mapping as appropriate evidence?

Where rectification requires replacement of an existing meter, we also ask whether the replacement should be encouraged to be a digital, remotely readable interval meter rather than replacing one legacy metering technology with another.

This could provide a practical transition pathway where existing compliant meters do not require immediate replacement, but assets are progressively modernised whenever replacement is already necessary.

9. Transition from legacy meters to digital assets

Western Australia has a significant legacy base of non communicating electronic meters and older electromechanical disc meters within private and embedded networks.

While many of these meters may continue to accurately measure cumulative consumption, modern digital metering can provide additional capabilities including remote reading, interval data, automated validation, fault identification, abnormal consumption detection, demand analysis and improved integration with solar, batteries and EV infrastructure.

PKTR encourages consideration of incentives or transitional mechanisms that support SPN providers in progressively transitioning legacy metering infrastructure towards digital, remotely communicating assets.

We are not suggesting that every legacy meter should be immediately replaced. Instead, practical transition points could include when a meter reaches end of life, requires replacement following an accuracy test, a customer adopts a time of use tariff, solar or battery infrastructure is introduced, EV charging is introduced, an SPN undergoes substantial redevelopment, or repeated manual intervention is required.

This would allow Western Australia SPNs to progressively modernise while avoiding an unnecessary immediate replacement burden.

We therefore ask whether DEED envisages providing guidance, incentives or transitional arrangements to encourage this transition.

10. Digital metering as an energy management asset

Digital metering provides benefits beyond billing compliance.

Modern remotely read interval meters can provide greater visibility of electricity consumption, maximum demand, load profiles, after hours consumption, solar utilisation, grid import and export, battery performance, EV charging and abnormal consumption.



The AES framework therefore presents an opportunity not only to strengthen customer protection, but also to encourage progressive modernisation of Western Australia embedded electricity infrastructure.

11. Publication through websites and social media

PKTR supports the requirement for providers with websites to publish important customer information, including complaints and dispute resolution procedures, Ombudsman information, access to the Code and applicable hardship and family violence policies.

We suggest consideration also be given to an SPN provider primary public social media or digital communication channel.

Some smaller providers may not maintain an actively used website but may communicate regularly through platforms such as Facebook, Instagram or LinkedIn. In some circumstances, customers may interact with these channels more frequently than with a corporate website.

We therefore suggest considering wording that permits or encourages required customer information to be readily accessible through the provider website and/or primary public social media or digital communication channel.

Where a provider maintains a website, the complete information could continue to be published there, while social media could provide a clear and permanent pathway directing customers to the relevant policies, Code, Ombudsman information and complaints process.

We believe the primary objective should be accessibility. Customers should be able to easily locate their rights and the appropriate complaint pathway regardless of the digital channel through which they normally interact with their provider.

12. Practical implementation guidance

PKTR encourages DEED and the ERA to provide practical implementation guidance as early as possible.

In particular, we would welcome guidance regarding registration information, asset registers, responsibilities of third party meter data and billing providers, Ombudsman interaction, meter accuracy testing, legacy meters, commissioning evidence, occupancy and vacation reads, data validation, retention requirements, audit trails, missing meter data, time of use metering, customer access to consumption information and the technical treatment of solar, batteries and EV charging.

Clear guidance would allow metering, technology and billing providers to build appropriate systems before commencement rather than reacting after the requirements take effect.

Closing comments

Overall, PKTR Energy AI supports the direction of the Alternative Electricity Services framework and the introduction of stronger and more consistent protections for customers within Single Property Networks.

For PKTR, the relationship is clear:

Customer Protection → Metering Accuracy → Data Integrity → Transparent Billing → Accountability

We believe these principles should form the foundation of a modern embedded electricity network.

PKTR Energy AI would welcome continued engagement with DEED, the ERA and the Energy and Water Ombudsman WA as the framework progresses.

As a Western Australian metering, engineering, meter data and technology provider, we are particularly interested in helping develop practical systems that translate the regulatory requirements into reliable day to day operation.

We would also appreciate early guidance regarding registration and technical information requirements so that we can begin preparing our customers, digital asset registers, metering infrastructure and data systems ahead of SPN commencement.

Thank you for the opportunity to provide feedback.

Kind regards,

PKTR Energy AI Pty Ltd