Sent: Friday, 25 September 2026 1:00 PM EPWA
To: Alternative Electricity Services Draft AES
Subject: Code of Practice - Submission

Good afternoon,

Richard Noble & Company supports the intent of the proposed Code and the introduction of appropriate consumer protections within Single Property Networks (SPNs). However, we have concerns that the current draft does not adequately distinguish between residential consumers and commercial tenants, resulting in a number of requirements that are unnecessarily burdensome and impractical in a commercial property environment.

We respectfully submit the following:

1. Separate Residential and Commercial Codes

Commercial tenants operate within a fundamentally different environment to residential consumers and should not be subject to the same regulatory framework. A separate Code for commercial SPNs would provide more appropriate and practical protections while reducing unnecessary compliance obligations.

2. Extend the Implementation Timeframe

The proposed commencement date of 31 July 2027 is premature given the industry is still consulting on a draft document and there is currently no certainty regarding the content or publication date of the final Code. We recommend implementation occur no earlier than 12 months after publication of the final Code.

3. Allow Reasonable Cost Recovery

The draft tariff provisions may require SPN operators to supply electricity at a loss while simultaneously absorbing the costs of compliance, administration and network operation. SPN operators should be permitted to recover their actual electricity costs together with a reasonable administration margin.

4. Remove Restrictions on Dynamic EV Load Management

Dynamic load management is critical to the successful implementation of EV charging infrastructure within commercial buildings. The Code should explicitly allow these systems to operate without creating additional compliance obligations.

5. Remove the Requirement to Provide Free Paper Statements

Electronic communication is standard practice in commercial property management. If a customer requests paper statements, SPN operators should be able to recover the reasonable costs of printing and postage.

6. Introduce a Consumption-Based Exemption Threshold

A risk-based framework should be adopted for smaller SPNs, with exemptions or reduced compliance obligations applying where total network consumption falls below a defined threshold.

7. Rebalance Technical Assistance Obligations

Several provisions require SPN operators to undertake significant technical investigations and due diligence on behalf of tenants. Where specialist advice or investigations are required, operators should be entitled to recover their reasonable costs, particularly in relation to Clause 30 given it is highly unlikely that a customer could practically exit an SPN.

8. Amend Change of SPN Operator Notification Requirements

The requirement to notify customers of a change of SPN operator within 48 hours is impractical for commercial property transactions and management transitions. Consideration should be given to extending this timeframe to 10 business days for commercial SPNs.

9. Extend Meter Testing Timeframes

The requirement for meter testing to be completed within 10 business days does not reflect the availability of suitably qualified electrical specialists in Western Australia. The Code should allow a reasonable timeframe for engagement and completion of testing.

The Code should ensure that all compliance and response timeframes are practical and achievable within a commercial property environment. Property transactions, management transitions and technical investigations often involve multiple stakeholders and specialist consultants. Timeframes should reflect these operational realities while still delivering appropriate protections for customers.

Thank you for your consideration.

Kind regards,
Lucie

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