Alternative Electricity Services Code of Practice 2027

Single property Network Services

SCA (WA) Submission on Exposure.

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Executive Summary 4

SCA (WA)'s central recommendation 4

Priority Recommendations 5

1. About SCA (WA) 5

2. SCA (WA)'s policy position 6

Proportionate regulatory test 6

3. A strata-specific, cost-recovery pathway 6

3.1 The provider models are materially different 6
3.2 Recommended eligibility criteria 7
3.3 Protections that should remain 7
3.4 Registration and Ombudsman scheme fees 8

4. Agreements, disclosure and changes of occupancy 8

4.1 The Code's transaction model does not fit all strata schemes 8
4.2 Disclosure must occur before the property decision 8
4.3 Execution at settlement and commencement of tenancy 9
4.4 Model documents, default provisions and deemed acceptance 9
4.5 Practical barriers to adopting by-laws 10

5. Roles, responsibility and information flow 11

5.1 A strata company is not its strata manager 11
5.2 Customer information and privacy 11

6. Billing, arrears and payment arrangements 11

6.1 Clause 33 requires data that may sit in different systems 11
6.2 Payment allocation and disconnection 12
6.3 Model billing specification 13

7. Hardship, family violence and life-support protections 13

7.1 Proportionate financial-hardship requirements 13
7.2 Family violence and life-support protections 14

8. Tariffs, cost recovery and sustainability 14

8.1 The standard tariff must not create an unfunded network 14
8.2 Time-of-use tariffs and distributed energy resources 15

9. Implementation and regulatory stewardship **15**

9.1 A complete implementation package 15
9.2 Practical transition requirements 16
9.3 Supported compliance and review 16

10. Implementation and regulatory stewardship **17**

11. Proposed Implementation Partnership **18**

Requested Next Step 18

12. Conclusion **18**

References **19**

Contact **19**

Executive Summary

Strata Community Association (WA) (SCAWA) supports the objective of ensuring that people supplied with electricity through single property networks receive clear information, fair billing, appropriate assistance when experiencing vulnerability or hardship, and access to effective dispute resolution.

The exposure draft materially advances those protections. However, it applies to a predominantly retail-style compliance model and a sector that includes two fundamentally different kinds of provider: commercial embedded network operators, and strata companies that are collectively owned by lot owners and commonly recover electricity costs without profit. ***Treating these models as equivalent will not produce equivalent consumer outcomes.*** In strata schemes, every new compliance cost is ultimately paid by the same consumers the framework is intended to protect, through electricity charges, strata levies or both.

SCA (WA)'s central recommendation

Retain the Code's core consumer protections, but create a proportionate, strata-specific compliance pathway for strata company-operated, cost-recovery SPNs. That pathway should be supported by model documents, clear allocation of responsibilities, coordinated property-law reform and a staged implementation program.

The present framework also assumes that the electricity provider can identify and contract directly with each customer, obtain information when occupation changes, maintain separate electricity arrears data, and implement sensitive hardship, family violence and life-support processes. Those assumptions do not consistently reflect the legal and operational structure of strata schemes. A strata company ordinarily holds owner information; it may have limited or delayed information about tenants and other occupiers. Its decisions are made collectively under the Strata Titles Act 1985 (WA), and many operational functions are delegated to a strata manager or specialist contractor.

These are not arguments against consumer protection. They are reasons to design the delivery mechanism so that the protections work in practice. SCA (WA) proposes an implementation partnership with DEED, Landgate, (the department responsible for strata and tenancy legislation), the Economic Regulation Authority, the Energy and Water Ombudsman and relevant industry bodies. The result should be a framework that:

- consumers can understand,
- strata companies can comply with,
- regulators can enforce and
- the energy transition can build upon.

Priority Recommendations

- Establish a simplified compliance pathway for strata company-operated SPNs that recover electricity and directly attributable network costs without profit.
- Retain non-negotiable consumer protections, while exempting eligible cost-recovery strata SPNs from preparing bespoke hardship policies and allowing compliance through prescribed minimum protections, approved model documents and specialist referral services.
- Develop a legally tested model SPN by-law and model SPN agreement, supported by amendments to default strata governance provisions and a clear mechanism by which incoming owners and occupiers are bound following proper disclosure.
- Coordinate amendments to strata, settlement and residential tenancy processes so customers receive SPN information before committing to buy or lease, and settlement agents obtain execution of an SPN agreement where a separate agreement is required.
- Amend the billing and arrears provisions so an electricity bill and a concurrently issued utility account statement may collectively satisfy clause 33, while preserving a clear and auditable electricity balance within consolidated strata accounting.
- Clarify the roles of the strata company, strata manager, lot owner/landlord, property manager, billing provider and SPN operator, including lawful information-sharing pathways.
- Permit transparent recovery of reasonable SPN costs and greater tariff flexibility, including time-of-use arrangements, without weakening price protections.
- Waive, or set at a nominal amount, registration and Ombudsman scheme fees for eligible not-for-profit, cost-recovery strata SPNs and review the unequal treatment of comparable green-title arrangements.
- Adopt a staged commencement, supported compliance period and formal post-implementation review, with templates and guidance available well before 1 July 2027.

1. About SCA (WA)

SCA (WA) is the peak professional association for the strata sector in Western Australia. Founded in 1989, it represents strata managers, service providers, owners, councils and other professionals involved in the governance and operation of strata communities.

SCA (WA)'s members work across schemes of every scale and type, from small legacy residential developments to large mixed-use communities incorporating shared solar generation, batteries, electric vehicle infrastructure and complex embedded networks. This gives SCA (WA) a distinctive view of how electricity regulation will interact with strata governance, property transactions, tenancy arrangements, trust accounting, billing systems and day-to-day customer service.

SCA (WA)'s earlier submission on the AES prescribing regulations explained that Western Australia has more than 52,000 strata schemes and more than 26,000 survey-strata schemes. The regulatory design therefore has the potential to affect a large and diverse section of the community, including owner-occupiers, investors, tenants, small businesses and volunteer council members.

SCA (WA) welcomes DEED's recognition of stakeholder concerns in the final regulations, including the exclusion for certain self-managed residential schemes of 10 lots or fewer, the delayed registration date and the six-month billing-system transition. Those changes are constructive. The Code now needs a similarly proportionate implementation model for the many strata schemes that remain in scope.

2. SCA (WA)'s policy position

SCA (WA) supports the following outcomes:

- Customers understand who supplies their electricity, how charges are calculated and where to seek help
- Electricity charges are transparent, reviewable and not used to extract unreasonable margins
- Customers experiencing hardship or family violence are treated sensitively and have access to appropriate support
- Life-support information is managed reliably and interruptions are communicated appropriately
- Complaints can be escalated to an independent dispute resolution body
- Strata communities can invest confidently in solar, batteries, ev charging and other distributed energy resources
- The policy question is therefore not whether these protections should exist. It is how they should be delivered across materially different provider models.

Proportionate regulatory test

For each obligation, government should ask:

- ***What consumer harm is being addressed?***
- ***Does the same risk arise in a member-owned, cost-recovery strata scheme?***
- ***What is the least burdensome method of securing the same protection?***
- ***Who is legally and operationally capable of performing the obligation?***

What cost will ultimately be passed back to the consumer?

3. A strata-specific, cost-recovery pathway

3.1 The provider models are materially different

A commercial embedded network operator supplies electricity as a business activity and may control the metering platform, customer agreements, tariffs, billing data and customer service systems. A strata company is a collective of villas, townhouses, apartments or commercial lots, and is a statutory legal entity created at the date of registration of a strata scheme, comprising the owners of all the lots. It may supply electricity only because of legacy infrastructure or a collectively owned energy system serves

the scheme. In many cases it passes through the retailer's cost, engages others to read meters or prepare bills, and does not derive a profit.

Applying the same administrative architecture to both models risks regulatory overreach. The likely response will be widespread outsourcing to specialist providers. Outsourcing may be appropriate for some schemes, but if it becomes the only practical compliance option it will increase levies, reduce owner control and concentrate the market, including schemes where the underlying consumer risk is modest.

3.2 Recommended eligibility criteria

SCA (WA) recommends that DEED establish a simplified pathway for a cost-recovery strata SPN where:

- ***The registered provider is the strata company or community corporation***
- ***Electricity is supplied only within the scheme***
- ***The strata company does not apply a profit margin to electricity supply***
- ***Charges are limited to wholesale/retail electricity costs and reasonable, transparent costs directly attributable to operating and complying with the spn***
- ***The scheme is not operated by a third party under a commercial concession or revenue-sharing model***
- ***The strata company maintains auditable records and gives customers access to the ombudsman where required***
-

Eligibility should turn on risk and business model, not lot number alone. A larger owner-controlled scheme may present less consumer risk than a smaller commercial arrangement.

3.3 Protections that should remain

The simplified pathway should preserve the substance of the following protections:

- Plain-language disclosure of the arrangement and pricing methodology
- Itemised and reviewable bills
- Reasonable payment options and protection from inappropriate disconnection
- Hardship and family violence assistance
- Complaints handling and ombudsman access
- Life-support registration and escalation
- Records sufficient for audit and enforcement

Proportionality should be achieved through:

- Standardisation,
- Targeted exemptions and
- Reduced duplication, while retaining minimum protections against consumer harm.

- An eligible strata company should be exempt from preparing and independently administering a bespoke hardship policy where it follows a DEED-approved framework, offers reasonable payment arrangements, uses a confidential specialist referral pathway and complies with the Code's minimum protections. The same scheme should be able to adopt model family violence, disclosure, complaints and life-support documents by reference and demonstrate compliance through an annual checklist or certification.

3.4 Registration and Ombudsman scheme fees

The cumulative cost of registration, Ombudsman membership, billing-system changes and specialist compliance support may be material for a strata company that supplies electricity without profit. Those costs will ultimately be paid by the same owners and residents the framework is intended to protect.

SCA (WA) recommends that registration and Energy and Water Ombudsman scheme fees be waived, or set at a nominal amount, for an eligible strata company-operated SPN that supplies electricity on a genuine cost-recovery basis. The eligibility criteria should exclude commercial concessions, revenue-sharing arrangements and providers applying an unreasonable margin.

The fee framework should also address the unequal treatment of comparable electricity arrangements affecting green-title properties. Government should explain the regulatory distinction and ensure that strata customers are not required to meet disproportionate costs solely because their property is held under a strata title.

4. Agreements, disclosure and changes of occupancy

4.1 The Code's transaction model does not fit all strata schemes

Clauses 10 to 13 assume a sequence in which the provider identifies a prospective customer, gives a disclosure statement, enters an SPN agreement and then commences supply. In a strata scheme, supply may already be physically available when a person purchases or occupies a lot. The strata company may not be a party to the sale or residential tenancy agreement and may not be notified promptly when a tenant moves in or out.

The AES Regulations recognise that, for a resident in a strata titles or community titles scheme, scheme by-laws may constitute the SPN agreement. That is a practical foundation, but it requires supporting property-law mechanisms, standard documentation and clear responsibility for obtaining execution where no binding by-law applies.

4.2 Disclosure must occur before the property decision

For a purchaser or tenant, the disclosure is most useful before they become legally committed to the property. Providing it only after settlement or occupation may technically inform the customer, but it

cannot influence the decision to buy or lease and does not create a genuine opportunity to understand the pricing model or supply limitations.

SCA (WA) recommends an interagency solution under which:

- **A prescribed SPN disclosure is included in the seller's strata disclosure package before a contract for sale is entered into**
- **The same information is provided before a residential tenancy agreement is signed**
- **The seller, settlement agent, landlord or property manager must transmit the incoming customer's details to the nominated SPN contact, subject to privacy safeguards**
- **The strata company is protected from breach where another party fails to provide information that the strata company could not reasonably obtain**

4.3 Execution at settlement and commencement of tenancy

Where the SPN agreement is not constituted through a registered strata by-law or another legally recognised statutory mechanism, it should be executed before settlement or occupation. The property transaction framework should require:

- The seller or strata company to provide the prescribed SPN disclosure and agreement to the settlement agent within a specified period before settlement
- The settlement agent to give the SPN documentation to the purchaser and obtain an executed SPN agreement before settlement
- The settlement agent to provide the executed agreement and relevant purchaser contact information to the nominated SPN contact promptly after execution
- The landlord or property manager to give the disclosure and agreement to a prospective tenant and obtain execution before the residential tenancy commences
- A clear statutory process where the required documentation is unavailable or a purchaser or tenant refuses to execute the agreement

Settlement agents, landlords and property managers should not be responsible for preparing the agreement, verifying technical electricity information or monitoring the provider's ongoing compliance. Their responsibility should be limited to giving the prescribed documents, obtaining execution where required and transmitting the completed agreement and customer information.

4.4 Model documents, default provisions and deemed acceptance

DEED, Landgate and strata-sector representatives should jointly develop:

- A legally tested model SPN governance by-law, with drafting guidance on the required resolution and registration process
- A model stand-alone SPN agreement for schemes where a by-law is unsuitable or not yet registered
- Model sale and tenancy disclosure wording

- A change-of-owner and change-of-occupier notification form
- Guidance for existing schemes, new developments and mixed-use schemes
- Amendments to the default governance provisions in Schedule 1 of the Strata Titles Act 1985 (WA), or an equivalent statutory mechanism, to support SPN arrangements

Where a registered strata by-law legally constitutes the SPN agreement, an incoming owner or occupier should be deemed to accept and be bound by that arrangement upon purchasing or leasing the lot, provided the prescribed disclosure was given before the person became contractually committed. A separate supply agreement should not then be required. The settlement agent, landlord or property manager should instead obtain written acknowledgement that the disclosure and relevant by-law were provided.

Where no binding by-law or statutory mechanism applies, a separate agreement should be executed through the settlement or tenancy process. This two-pathway approach avoids duplicate contracting while ensuring that every customer receives disclosure and is brought within an enforceable SPN arrangement.

4.5 Practical barriers to adopting by-laws

Requiring every scheme to commission bespoke legal drafting would impose avoidable cost and create inconsistent documents. It may also be difficult for a strata company to obtain owner approval to fund legal drafting or secure the resolution without dissent required to adopt the by-law. Schemes that rely on untested or automatically generated drafting may create provisions that do not satisfy the AES or strata legislation.

The implementation period must recognise that a strata company may need to:

- Convene a general meeting to approve expenditure for legal and specialist advice, allowing for statutory notice and delivery periods
- Obtain drafting input from the council, owners, the strata manager, energy consultants and service providers
- Convene a further general meeting to consider the proposed by-law
- Complete the voting period applicable to a resolution without dissent, which may extend for 28 days where votes are received after the meeting
- Prepare and lodge the amendment with Landgate and allow for a registration period that may extend for several months

A legally tested model instrument should therefore be available at least six months before schemes are expected to adopt it. If the model documents and supporting legislative mechanisms are not available in that period, the commencement date for the affected obligations should be deferred or a statutory transitional period should apply.

5. Roles, responsibility and information flow

5.1 A strata company is not its strata manager

The strata company may be the SPN service provider. The strata manager is ordinarily an agent performing functions within the scope of a management contract. A billing provider may read meters and issue bills, while a facilities contractor may manage the physical network. A lot owner or property manager may hold the only current information about a tenant. The Code should not blur these roles. Clause 5 makes the AES provider responsible for a third party's compliance. SCA (WA) understands the need to prevent outsourcing from diluting consumer protection. However, an absolute attribution model creates significant exposure for a volunteer-controlled entity even where it has selected a competent contractor, provided accurate instructions and maintained reasonable oversight.

SCA (WA) recommends that DEED:

- **Publish a responsibility matrix distinguishing the registered provider, agent, billing provider, owner/landlord, property manager and network contractor**
- **Confirm that the strata manager does not become the spn provider merely by performing administrative work as agent**
- **Allow approved functions to be performed through qualified third parties**
- **Consider a due diligence defense or rectification pathway for third-party breaches where the provider took all reasonable steps**
- **Preserve direct regulatory action for systemic, reckless or deliberate non-compliance**

5.2 Customer information and privacy

Hardship, family violence and life-support obligations involve sensitive personal information. Councils of owners should not routinely receive that information. The Code and implementation guidance should require secure, need-to-know handling and allow the provider to nominate an appropriately trained contact or specialist service.

The implementation package should also identify the lawful basis and minimum dataset for information to pass between landlords, property managers, strata companies, strata managers, billing providers and distributors. Without this, providers may be expected to perform obligations while lacking either the information or legal authority needed to do so.

6. Billing, arrears and payment arrangements

6.1 Clause 33 requires data that may sit in different systems

Clause 33 requires a bill to include information about the current electricity charge, amounts in arrears or credit and any applicable payment-plan arrangements. In many strata schemes, this information is

held across separate systems. A specialist provider may hold the meter and consumption data required to calculate the electricity charge, while the strata company or strata manager holds payment, allocation, credit, arrears and debt-recovery information within the strata accounting system.
The Code should expressly permit the required information to be provided through two documents issued concurrently:

- An electricity bill prepared by the metering or billing provider, showing consumption, tariff information and the current electricity charge
- A separate utility account statement prepared from the strata company's accounting records, showing payments, credits, electricity arrears and any applicable payment arrangements
- Where the two documents are issued together, they should collectively satisfy clause 33, provided that:
- Each document clearly refers to the other
- Both identify the relevant customer, property and billing period
- Any different balance dates are clearly stated
- Electricity charges and arrears are separately identifiable from levies and other strata debts
- The documents do not contain inconsistent information
- The customer is given a single contact point for billing enquiries, disputes and current account information

This approach would provide customers with complete and transparent information without requiring the billing provider to access or reproduce the strata company's entire accounting ledger. It would also reduce the risk of duplicated records, inconsistent balances and unnecessary system-development costs.

The code should make clear that the information required by clause 33 does not need to appear in a single document where the electricity bill and accompanying utility account statement are delivered together and collectively provide all prescribed information.

6.2 Payment allocation and disconnection

Clauses 45 and 46 contain important protections, including minimum notice, a prohibition on disconnection for non-electricity amounts and reconnection following payment or a payment arrangement. SCA (WA) supports those safeguards.

DEED should expressly recognise that electricity arrears may be maintained and administered through the strata company's broader debt-recovery process, provided that electricity amounts remain separately identifiable and customers can obtain current account information on request. The Code should prescribe a transparent allocation rule, allow a customer to direct a payment to the electricity component and ensure that non-electricity debts cannot support disconnection. Disconnection should remain optional, be used only as a last resort and be carried out by an appropriately qualified person. Nothing in the Code should imply that a strata company must disconnect a customer to manage arrears.

6.3 Model billing specification

DEED should publish a machine-readable billing specification and worked examples for metered, unmetered, time-of-use and consolidated strata accounts. This should occur early enough for strata software providers and billing businesses to update their systems. The six-month billing transition in regulation 18 is helpful, but development cannot commence efficiently until the specification is settled.

7. Hardship, family violence and life-support protections

7.1 Proportionate financial-hardship requirements

SCA (WA) supports the principle that customers experiencing financial hardship should have access to appropriate assistance and should be protected from unreasonable debt-recovery or disconnection action. However, requiring every strata company operating an SPN to develop, publish and independently administer a comprehensive financial-hardship policy is disproportionate where the strata company supplies electricity on a genuine cost-recovery basis and is not operating as a commercial energy retailer.

Strata companies are generally volunteer-controlled entities. They do not employ specialist hardship teams and are not established to assess customers' financial circumstances, determine eligibility for government concessions or provide financial counselling and case-management services. Requiring each strata company to perform these functions would create significant compliance costs, privacy risks and inconsistent customer outcomes.

SCA (WA) recommends that an eligible cost-recovery strata SPN be exempt from preparing and maintaining its own standalone financial-hardship policy, provided that it:

- **Adopts the minimum hardship protections prescribed by the Code**
- **Offers reasonable payment arrangements having regard to the customer's circumstances**
- **Does not disconnect a customer while a genuine request for hardship assistance is being assessed**
- **Provides information about relevant concessions, financial counselling and support services**
- **Maintains appropriate confidentiality and recordkeeping arrangements**
- **Refers customers requiring specialist assistance to an approved external service or nominated specialist provider**
- **Continues to provide access to the Energy and Water Ombudsman where required**

DEED should develop a single approved hardship framework for eligible strata SPNs. Compliance with that framework should satisfy the provider's hardship obligations without requiring each strata company to prepare a bespoke policy or establish an internal hardship-management function.

7.2 Family violence and life-support protections

SCA (WA) supports consistent minimum standards for family violence and life-support protections. Their delivery must protect confidentiality and recognise that most strata companies do not employ specialist customer-assistance teams.

SCA (WA) recommends:

- **A single DEED-approved family violence policy that eligible strata providers may adopt without bespoke drafting**
- **A confidential referral and case-management protocol suitable for use by a nominated specialist provider**
- **Clear limits on the information disclosed to councils of owners, owners and other residents**
- **Standard life-support forms, annual verification wording and transfer protocols**
- **A clear escalation pathway with the relevant distributor for planned and unplanned interruptions**
- **Training and guidance for strata managers and specialist contractors before commencement**

A consumer should receive the same substantive family violence and life-support protections regardless of provider type. Standardised documents and specialist delivery are more likely to achieve that objective than requiring thousands of individual strata companies to design and administer their own systems.

8. Tariffs, cost recovery and sustainability

8.1 The standard tariff must not create an unfunded network

Clauses 22 to 25 link the standard tariff to regulated retail tariff components. SCA (WA) supports a clear price ceiling and protection against unreasonable margins. However, an SPN has costs that may not be reflected in the benchmark retail tariff, including submetering, meter reads, billing, registration, Ombudsman membership, compliance support, network losses, maintenance, insurance, testing and replacement of private network infrastructure.

If reasonable SPN costs cannot be recovered transparently through electricity charges, they will be transferred to strata levies. That does not remove the cost; it obscures it and may shift it to owners who are not the relevant consumers. The Code should permit recovery of reasonable, efficiently incurred and directly attributable SPN costs, subject to itemisation, auditability and a prohibition on unreasonable profit.

8.2 Time-of-use tariffs and distributed energy resources

SCA (WA) recommends greater tariff flexibility, including workable time-of-use arrangements. Time-of-use tariffs can better reflect actual wholesale and network costs and encourage consumption when shared solar generation is available. Overly restrictive tariff rules may disadvantage SPNs relative to licensed retailers and make owner-funded solar, batteries and EV charging less viable, contrary to wider decarbonisation objectives.

The Code should allow an informed customer or strata community to adopt a transparent time-of-use or other innovative tariff where:

- **The methodology and all components are disclosed**
- **The customer can compare it with the standard tariff**
- **The arrangement does not produce an unreasonable overall charge**
- **Network and distributed-energy costs are allocated on an objective basis**
- **The customer has an accessible review and complaints process**

DEED should also clarify clause 31 so that it does not prevent a strata company from allocating collectively approved costs of common-property distributed energy resources through lawful strata contributions. The distinction between an electricity charge and a strata contribution for collectively owned infrastructure must be explicit.

9. Implementation and regulatory stewardship

9.1 A complete implementation package

Registration for SPN providers is intended to become mandatory on 1 July 2027, and the regulations provide a six-month transition for specified billing requirements.[2][3] To make that date achievable, DEED should publish a complete implementation package no later than six months beforehand, including:

- The final Code and consolidated guidance
- Eligibility criteria for the simplified strata pathway
- The model SPN by-law, model agreement and any required amendments to default governance provisions
- Model disclosure, family violence, complaints and life-support documents, together with the approved minimum hardship framework
- Responsibility and privacy matrices
- Billing specifications and worked examples, including concurrent electricity bills and utility account statements
- Registration guidance and a no-cost or nominal-fee category for eligible not-for-profit strata spns

- Guidance on interpreter services, meter testing and the functions that may be performed through an approved specialist provider
- Education materials for owners, councils, strata managers, settlement agents, property managers and tenants

9.2 Practical transition requirements

A strata company cannot adopt a compliant governance framework immediately. Depending on its existing documents and delegations, it may need to approve expenditure, obtain legal and technical advice, engage with owners and contractors, convene meetings, secure a resolution without dissent, complete any applicable post-meeting voting period, lodge the by-law and wait for registration. Even where the model documents are available, this process may require:

- At least 14 days' notice, together with applicable delivery time, for each required general meeting
- Time for the lawyer to prepare or adapt the by-law with input from the council, owners, strata manager, energy consultant and service providers
- A further meeting and the voting period applicable to a resolution without dissent, which may extend for 28 days
- Preparation and lodgement of the amendment with Landgate
- A Landgate registration period that may extend for several months

If the complete implementation package and supporting legislative mechanisms are not available at least six months before commencement, the affected obligations should be deferred or a statutory transitional period should apply. Schemes should not be exposed to enforcement where compliance depends on government materials, legislative amendments or registrations that were not available within a reasonable period.

9.3 Supported compliance and review

SCA (WA) recommends a risk-based compliance approach for the first 12 months. Regulators should prioritise education, remediation and serious consumer harm, while retaining enforcement for deliberate overcharging, unsafe practices, obstruction of complaints or repeated non-compliance. A formal review should occur 12 and 24 months after commencement, measuring:

- ***Compliance cost per scheme and per customer***
- ***Changes in electricity and strata charges***
- ***Complaint volumes and themes***
- ***Use of hardship, family violence and life-support protections***
- ***Market concentration and outsourcing***
- ***Disconnections and reconnections***
- ***Investment in solar, batteries and EV infrastructure***

10. Implementation and regulatory stewardship

Provision	Issue in strata schemes	Recommended response
cl. 5	Provider is attributed with third-party non-compliance even where a volunteer-controlled strata company has engaged competent specialists and maintained oversight.	Retain provider accountability and add a reasonable-steps/due-diligence and prompt-rectification pathway. Publish a responsibility matrix.
cll. 7-8	Individual schemes may duplicate websites, policies, accessibility work and interpreter-service arrangements.	Permit publication through an approved central portal or nominated agent, with free paper copies and access to an approved interpreter service on request.
cll. 10-13	The provider may not know of an incoming purchaser or occupier before supply begins and may have no role in the sale or tenancy transaction. This prevents timely disclosure, execution and account establishment.	Integrate disclosure and execution into sale, settlement and tenancy processes. Require settlement agents and property managers to obtain execution where a separate agreement is required. Where a registered by-law constitutes the agreement, deem acceptance on purchase or leasing after prescribed disclosure and require written acknowledgement rather than a duplicate supply contract.
cll. 15-16	Tariff and provider changes may require collective decisions and multiple communication channels.	Clarify when notice to an owner, occupier or nominated agent is effective and allow coordinated scheme-wide notice plus direct customer notice.
cll. 20-21	Move-in and move-out dates may not be notified to the strata company, preventing timely meter reads.	Create owner/landlord/property-manager notification duties and a reasonable-knowledge qualification for the provider.
cll. 22-25	Benchmark tariff components may not recover reasonable private-network, compliance and billing costs; costs may be displaced to levies.	Allow transparent recovery of efficiently incurred, directly attributable SPN costs, subject to audit and no unreasonable profit. Expand workable time-of-use options.
cl. 31	The line between electricity charges and lawful strata contributions for collectively owned DER infrastructure is unclear.	Confirm that the clause does not prevent lawful contributions for common-property assets, while prohibiting duplicate charging through the electricity bill.
cll. 32-35	Electricity consumption and billing data may be held by a specialist provider, while payments, credits, arrears and payment-plan information are held in the strata accounting system. Requiring all information in one document is costly and may create conflicting balances.	Permit an electricity bill and a separate utility account statement to be issued concurrently and collectively satisfy the prescribed requirements. Require clear cross-referencing, stated balance dates, separate identification of electricity debt and a single customer contact point.
cll. 40-43	Volunteer-controlled strata companies do not have specialist hardship teams and should not be required to develop or independently administer retailer-style hardship programs. Bespoke policies would duplicate costs, create privacy risks and produce inconsistent outcomes.	Exempt eligible cost-recovery strata SPNs from maintaining their own standalone hardship policy. Require compliance with prescribed minimum protections through a single DEED-approved framework, reasonable payment arrangements, confidential referral pathways and access to specialist support.
cll. 45-47	Common ledgers require clear payment allocation; schemes may incorrectly assume they must disconnect to enforce arrears.	Specify payment-allocation rules, confirm disconnection is optional and a last resort, and require qualified implementation.
cll. 48-49	A strata provider may depend on a distributor or contractor for interruption information.	Apply a reasonable-knowledge standard and prescribe prompt pass-through of notices received from the distributor or contractor.

Provision	Issue in strata schemes	Recommended response
cll. 50-51	Thousands of schemes independently developing AS 10002-consistent procedures will duplicate cost.	Publish a model complaints procedure and permit centralised administration through a nominated agent.
cll. 52-54	Life-support data is highly sensitive and must pass reliably between customer, provider, agent and distributor.	Provide standard forms, secure handling rules, annual verification wording and transfer/escalation protocols.
Schedules 1-2	The residential disclosure is lengthy and may be difficult to complete accurately for legacy schemes.	Develop a strata-specific short-form disclosure supported by a detailed schedule, worked examples and digital templates.
Meter testing provisions	Most strata companies and strata managers do not have the technical capability, equipment or accreditation to conduct meter testing or determine technical disputes.	Allow testing to be performed by an appropriately qualified third party, prescribe a clear request and cost-allocation process, and protect the strata company where it reasonably relies on an accredited provider.
Registration and Ombudsman fees	Commercial fee structures impose disproportionate costs on owner-controlled strata SPNs that recover electricity costs without profit. Comparable green-title arrangements may not bear the same burden.	Waive, or set at a nominal amount, registration and Ombudsman scheme fees for eligible not-for-profit, cost-recovery strata SPNs and review the unequal treatment of comparable green-title arrangements.

11. Proposed Implementation Partnership

SCA (WA) invites DEED to convene a time-limited strata implementation working group before the Code is finalised. The group should include DEED, Landgate, the relevant strata and tenancy policy agencies, the ERA, the Energy and Water Ombudsman, SCA (WA), consumer representatives, strata software providers and specialist energy/billing providers.

Within a defined work program, the group could test the model documents, map transaction and data flows, identify legislative dependencies, validate billing examples and develop consumer-facing guidance. SCA (WA) can assist by convening practitioners, testing materials against real scheme scenarios and supporting sector education.

Requested Next Step

Meet with SCA (WA) and relevant agencies within four weeks of consultation closing to agree the design of the simplified strata pathway and the implementation work program.

12. Conclusion

The AES framework can materially improve protection for customers in single property networks. To succeed in strata schemes, it must recognise that the provider and the consumer are often part of the same owner community, that key functions are distributed across several parties, and that compliance costs are ultimately recycled back to consumers.

SCA (WA) is not seeking an exemption from accountability or substantive consumer protection. It is seeking targeted relief from obligations that are unnecessary or unworkable for a not-for-profit, cost-recovery strata provider.

A strata-specific pathway should include concurrent billing documents, proportionate hardship arrangements, coordinated sale and tenancy processes, legally effective by-law and agreement mechanisms, appropriate fee relief and a realistic statutory transition period.

SCA (WA) would welcome the opportunity to work directly with DEED and other agencies to resolve these issues before the Code is made. It is an SCA (WA) recommendation that: early collaboration will reduce implementation risk, improve customer outcomes and support continued investment in sustainable energy infrastructure across Western Australia's strata communities.

References

[1] Strata Community Association (WA), Submission on the Exposure Draft Electricity Industry (Alternative Electricity Services) Regulations 2025, April 2026.

[2] Department of Energy and Economic Diversification, AES Regulations - Final changes made after consultation, August 2026.

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

[4] Department of Energy and Economic Diversification, Exposure Draft Alternative Electricity Services Code of Practice 2027.

[5] Electricity Industry (Alternative Electricity Services) Regulations 2026 (WA).

[6] Energy Policy WA, AES Code of Practice for Single Property Network Services Consultation (consultation closes 5.00 pm AWST, 25 September 2026).

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