

Submission to Energy Policy WA on the Electricity Industry (Alternative Electricity Services) Amendment Bill

12 April 2023

The Western Australian Council of Social Service Inc. (WACOSS) welcomes the opportunity to make a submission to Energy Policy WA on the consultation draft of the Electricity Industry (Alternative Electricity Services) Amendment Bill 2023.

WACOSS is the peak body for the community services sector in Western Australia and works to create an inclusive, just and equitable society. We advocate for social and economic change to improve the wellbeing of Western Australians, and to strengthen the community services sector that supports them. WACOSS is part of a network consisting of National, State and Territory Councils of Social Service, who advance the interests of people on low incomes and those made vulnerable by the systems that have been put in place.

It is critical that all small-use electricity consumers are able to rely on a system of customer protections that ensures they have affordable and reliable access to an essential service like electricity. Those protections should include assistance when they are experiencing financial hardship so that they can maintain their connection to this essential service, as well as appropriate protections for those consumers who are victim survivors of family and domestic violence.

With the emergence and growth of alternative electricity services, it is vital that the relevant legislation is responsive to the development of new services and allows for those protections to be available for all households, regardless of the nature of the electricity services they receive. It is important to recognise that households who are experiencing hardship, marginalisation or vulnerability, may be customers of alternative electricity services such as embedded networks, and so currently have limited protections available to them.

As such, WACOSS strongly supports the proposed amendments to the *Electricity Industry Act 2004* that will enable a service to be prescribed in regulation so that enforceable protections, including the ability to access the Energy and Water Ombudsman, can be provided for electricity customers of that service.

WACOSS considers the proposal to include pricing control obligations within an AES Code of Practice to be appropriate and necessary. Customers who are relying on alternative electricity services to provide their access to an essential service, such as those in embedded networks, should not be worse off than they would be on the regulated tariffs. Establishing the ability within the heads of power to impose pricing controls, therefore, is crucial.

Regulators must be empowered so that they are able to act to ensure those protections are being provided and engage in the necessary compliance enforcement measures where they are not. For

this reason, WACOSS considers the proposed provisions to provide the Economic Regulation Authority clear regulatory oversight over prescribed services and the responsibility for the enforcement of the AES framework, including investing the Authority with the power to impose enforceable undertakings, to be a critical component for the success of the framework. Without suitable tools and powers available to the Authority to enforce compliance, it will not be possible to ensure the intent of AES framework is achieved and that the interests of consumers are safeguarded.

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Yours sincerely,

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