

21 April 2023

Ms Sarah Woenne
Assistant Director Customer Supply
Strategic and Consumer Policy Division
Energy Policy WA
Department of Mines, Industry Regulation and Safety
via email EPWA-info@dmirs.wa.gov.au

Dear Ms Woenne

Re: Alternative Electricity Services Consultation Paper

Thank you for the opportunity to provide feedback on the consultation paper for the Electricity Industry (Alternative Electricity Services) Amendment Bill.

ATCO supports the creation of a regulatory framework to improve customer protections for the delivery of new and emerging electricity service businesses.

We have been following the development of this framework to understand the implications for Source Energy Co, a wholly owned subsidiary of ATCO. Source Energy Co. is an embedded network provider in Western Australia providing multi-storey and strata residences with access to cleaner, innovative and affordable energy and infrastructure solutions.

Industry regulation to enable consumer protection is welcomed and will help to raise the standard of services provided by all embedded networks. However, regulation must be balanced against the imposition of requirements that may erode the benefits of embedded network business models.

ATCO is cautious of the proposal for the Alternative Energy Services Code of Practice to include pricing control obligations. While the intent of the proposal for consumer protection is appreciated, the services of embedded network providers are already subject to market pressures that act to limit price movements. Any form of price control obligation will need to also take into account capital costs, other delivered services and infrastructure for embedded networks and not just the delivered price of electricity.

If you have any questions or would like to discuss any of these issues, please contact Kiran Ranbir, Manager Energy Policy and Government Strategy on [REDACTED]

Yours sincerely

Russell James
General Manager Source Energy