

6 February 2026

Economic Regulation Authority
Level 4, Albert Facey House
469 Wellington Street, Perth WA 6000
Lodged electronically at: <https://www.erawa.com.au/consultation>

Change Energy Submission – Framework and Approach for Western Power’s Sixth Access Arrangement (AA6)

Change Energy welcomes the opportunity to comment on the Economic Regulation Authority’s (ERA’s) issues paper in relation to Western Power’s access arrangement proposal (AA6) issued 1 December 2025.

Established in 2016, Change Energy is an electricity retailer supplying almost 1000 business customers across the SWIS. Change Energy has a strong interest in ensuring that Western Power’s AA6 proposal delivers efficient, transparent, and customer-focused outcomes. Network tariffs represent a significant component of business customers’ electricity costs, and it is essential that the AA6 framework supports affordability, reliability, and efficient investment.

Issue 1

We are seeking stakeholder views on their expectations for Western Power’s AA6 proposal.

Change Energy expects Western Power AA6 proposal to clearly demonstrate how they will resolve the ongoing issues regarding fit for purpose tariffs, long wait times for customer connections and behind the meter DER approvals.

Issue 2

What changes are needed to the current list of reference services and tariff structures to support new technologies and energy model, while providing incentives that will reduce overall costs for consumers.

Change Energy supports the ERA’s review of reference services to ensure they remain appropriate for a rapidly changing energy landscape. As businesses adopt distributed energy resources (DER), electrification, and flexible loads, it is important that reference services reflect actual customer needs and are cost reflective.

As an example, Change Energy’s long-held view is that the RT6 tariff should not be based on a rolling-12-month peak demand, but be set monthly during the peak period. Evidence has never been provided that using a rolling-12-month peak is cost reflective.

AA6 should build on the AA5 storage tariffs to make them useful to customer that install battery storage as part of their business, not for the “primary” purpose of providing storage to the grid. This would help incentivise customer to support the grid in a least cost manner.

Issue 3

We are interested in stakeholder views on what changes may be needed to metering services to reflect that most customers have advanced meters.

Change Energy supports Western Power's roll-out of smart meters – it is supporting the demand for more data in a timely fashion. We view metering services to be adequate at this point in time.

Issue 4

We are interested in stakeholder views on improvements that could be made to the framework for payments for services (including new and upgraded connections) that are not included in network tariffs.

The entire process around new and upgraded connections and DER approvals should be of significant focus for the ERA in AA6. Western Power should be required to publish ongoing timeframes and average costs for these services.

Issue 5

We are interested in stakeholder views on setting disaggregated service standards for reliability and improving service standards relevant to business processes.

As outlined in Issue 4, Change Energy would support strong service standards in the connection processes.

In respect to disaggregating services standard regarding outage information, there should be a clear cost/benefit for customers.

Issue 6

We are interested in stakeholder views on what improvements could be made to Western Power's connection processes and whether additional mechanisms are needed to incentivise Western Power.

As part of AA6 Western Power should provide a complete review of their current process and stakeholder feedback sought. Connections are a core function of a network provider and should not need to be incentivised through regulation.

Change Energy does not have any comments on Issues 7 and 8.