

6 February 2026

Economic Regulation Authority

Level 4, Albert Facey House

469 Wellington Street

Perth WA 6000

Submitted online

RE: Endorsement of Submission on Framework and Approach for Western Power's Sixth Access Arrangement Review (AA6)

The Western Australian Expert Consumer Panel (the Panel) appreciates the opportunity to provide our perspectives on the Economic Regulation Authority's (ERA) Issues Paper for Western Power's Sixth Access Arrangement (AA6).

Panel members support the detailed submission provided by Panel member Chris Alexander. This submission is informed by discussions with fellow members of the WA Advocacy for Consumers of Energy (WA ACE) Forum, including the Western Australian Council of Social Service (WACOSS), Electrify Everything WA, and the Regional Chambers of Commerce and Industry.

Western Australia is well-positioned to lead a successful energy transformation. We believe that by streamlining the connection and integration of new utility-scale and small-scale renewables, storage and other DER technology, as well as adopting new approaches for network management, that the state can unlock significant economic benefits. Increasing the supply of low-cost renewable energy is a vital lever for reducing wholesale electricity costs, which will ultimately help ease the financial pressure on household and small business bills during this period of high cost-of-living.

The AA6 framework provides a timely opportunity to explicitly reflect the expanded State Electricity Objective (SEO), which now includes a specific environment (incorporating emissions) limb. To support the state's decarbonisation goals while ensuring the transition remains equitable and customer-centric, the Panel suggests the following strategic priorities:

- **Demonstrate commitment to the environmental limb of the SEO:** It is essential that Western Power demonstrates equal consideration and prioritisation of environmental outcomes (including but not exclusively emissions reduction), in all major planning and

decision making processes, as per the SEO. AA6 must identify how Western Power will elevate the importance of environmental outcomes in its planning and decision making, and set expectations for how it will identify and report on its' consideration of environmental impacts.

- **Implementing a TOTEX Framework:** We advocate for a Total Expenditure (TOTEX) approach to encourage the most efficient solutions. This would allow Western Power to be financially indifferent between traditional infrastructure and "non-network" flexibility services, rewarding the choice that delivers the best value for consumers.
- **Supporting the DSO Transition:** As Western Power transitions to its role as a Distribution System Operator (DSO), the AA6 framework can provide the necessary incentives for grid visibility and market facilitation. This will allow the network to better integrate the rapid surge in residential batteries—now averaging over 100 installations per day—for the benefit of all users.
- **Modernising Network Tariffs:** We see a proactive opportunity to reform business demand tariffs (RT5–RT8 and transmission tariffs) to better support the adoption of behind-the-meter (BTM) batteries. Providing better network price signals to encourage beneficial customer responses and technology take-up will improve overall grid health and economic efficiency.
- **Enhancing Regional Accountability:** To ensure all Western Australians benefit from the transition, we propose adopting customer-centric standards for connections and reliability. Introducing automatic Guaranteed Service Level (GSoP) payments will provide a constructive mechanism for Western Power to address regional reliability disparities and connection timelines.
- **Fostering Innovation through Data:** We encourage the ERA to incentivise the publication of granular, feeder-level "Traffic Light" Capacity Maps and an API-accessible "Presumed Open" Data Register. This transparent approach will empower the market to identify "plug-and-play" locations, streamlining the connection process for new energy providers, and assist with making the most from the substantial network investment that has gone into the AMI roll-out.
- **Ensuring that the right incentive structures are in place:** We encourage the introduction of suitable DSO Performance Incentives, and 'Price Control Deliverables' that link AA6 funding to measurable outcomes in grid visibility, market facilitation, network utilisation and consumer-led grid support.

Western Australians are already demonstrating their commitment to a cleaner energy future through the record adoption of rooftop solar and home batteries. By adopting a more agile and customer-focused regulatory model, the AA6 process can ensure the network remains a stable,

clean, and affordable asset for the entire community.

We look forward to a constructive dialogue with the ERA and Western Power throughout the AA6 review process.

Yours sincerely,

Expert Consumer Panel