

**Submission**

**Economic Regulation Authority**

**Framework and Approach for  
Western Power Access  
Arrangement 6**

**February 2026**

## About WALGA

The Western Australian Local Government Association (WALGA) is an independent, member based, not-for-profit organisation representing and supporting the WA Local Government sector.

Our membership includes all 139 Local Governments in the State. WALGA uses its influence, support, and expertise to deliver better outcomes for WA Local Governments and their communities. We do this through effective advocacy to all levels of Government on behalf of our Members, and by the provision of expert advice, services, and support to Local Governments.

WALGA's vision is to be the authoritative voice and trusted partner for Western Australian Local Government.

## Acknowledgement of Country

WALGA acknowledges the continuing connection of Aboriginal people to Country, culture and community. We embrace the vast Aboriginal cultural diversity throughout Western Australia, including Boorloo (Perth), on the land of the Whadjuk Nyoongar People, where WALGA is located and we acknowledge and pay respect to Elders past and present.

## Summary

This submission highlights critical Local Government issues relating to Western Power's access arrangements and is in response to the Economic Regulation Authority's Issues paper on the subject. Feedback from Local Governments consulted through a WALGA Discussion Paper, highlighted the following key matters that are put forward for consideration by the Economic Regulation Authority (ERA) in determining the services that will be regulated through the access arrangement and the nature of regulatory arrangements for the Access Arrangement 6 (AA6) period:

- Streetlighting – testing of new equipment, Public Lighting Strategy adherence, complaint handling, acceleration of LED replacement, enhanced service standards, smart lighting, nighttime inspection, etc.
- Provision of a Public Lighting Code
- Targeted Underground Power Program – provide transparent unit rates, output-based adjustment, more focus on designated growth areas
- Regional reliability improvements
- EV Charging Stations
- LED replacement services improvements
- Streamlining of vegetation management
- Better practices around moving/removing electricity distribution and transmission equipment
- Risk-based/stratified to cost/work to be performed for specific services
- More granular reporting
- Provision of more standalone power storage facilities
- Reduction in connection wait times
- Benefit-sharing for multi-use of assets
- Clearer communication and transparency of asset life and limitations
- Risk assessment for pole-top fires
- Provision of Western Power Project Portal

Additional detail can be provided at the appropriate time during the consultation processes leading to finalising AA6.

## Introduction

WALGA welcomes the opportunity to comment on the Economic Regulation Authority (ERA) Issues paper relating to the framework and approach for Access Arrangement 6 (AA6) on behalf of the Local Government sector. Local Governments have a unique, multi-faceted relationship with Western Power, including as the primary user of streetlighting services, as the main source of sustained demand for electricity infrastructure relocations and as a complex electricity consumer. As a result, the Local Government sector's perspectives on the required scope of Access Arrangements are likely different to that of most other sectors.

This submission will address key areas of Local Government interest as they relate to the issues identified in the ERA's Issues Paper and highlight other areas of critical importance to the Local Government sector that merit consideration in the next access arrangement.

## Background

The Local Government sector, via WALGA, has provided input into previous Access Arrangements on several occasions; in previous submissions, some issues were adequately addressed and others

were not included. This submission highlights instances where Access Arrangement 5 (AA5) did not satisfactorily address critical issues for the Local Government sector, while also identifying new issues not addressed in AA5 for consideration in AA6.

As mentioned, Local Governments are uniquely positioned with respect to Western Power. As such, elements of access arrangements will have sweeping effects on how Local Governments consume electricity, program road construction and land development projects, and pay for streetlights, among other Local Government functions.

This submission is based on feedback from metropolitan and regional Local Government officers, as well as from the elected members of WALGA's State Council. All feedback was provided in January and February 2026.

## Critical Issues

In the ERA's [Issues paper](#), several issues were identified as critical in determining the framework and approach for AA6. Local Government feedback has been collated and presented under each of the following headings, which align to the ERA Issues paper. Other significant issues to the Local Government sector are listed under the final heading.

### 1. Expectations for Western Power's AA6 Proposal

#### Streetlighting

In addition to streetlight repair time performance standards (average repair time less than 5 business days in the metropolitan area and less than 9 business days in regional areas), the ERA, in approving the current Access Arrangement (AA5), required Western Power commit to the following:

1. Before introducing any new streetlighting equipment that is likely to affect lighting performance (e.g. globes and luminaires), it must be independently tested against relevant standards and the results published. This will inform whether and how a new asset can be deployed in consultation with customers. (This applies to the LED screw in globe as well as other luminaires).
2. Consult on and publish its Public Lighting Strategy and ensure it complies with the strategy. The strategy must be published at least annually<sup>1</sup> or more frequently if a significant change is required.
3. Clarification of Western Power's complaint handling responsibilities (seeking to resolve issues with customers referred to Local Governments for lighting performance issues).

These elements remain important for the Local Government sector. Strategic public lighting issues previously identified and not adequately addressed in the current AA5 are:

- Accelerating replacement of old lighting technology with LED lighting. Local Governments suggest that the 10-year timeline (2034) set out in the Western Power Public Lighting Asset Management Strategy<sup>2</sup> is too long, and well behind the target set out in the Western Power Corporate Strategy to replace all streetlights with LEDs by 2029<sup>3</sup>. (Decisions by Synergy in

<sup>1</sup> The Public Lighting Asset Management Strategy published in July 2024 has not yet been revised. Consultation with Local Governments to revise the strategy commenced in December 2025.

<sup>2</sup> [Public Lighting Asset Management Strategy June 2024](#) Accessed 28 January 2026

<sup>3</sup> Western Power Corporate Strategy | 2021-2031

July 2025 to increase LED tariffs, including customer funded LEDs, by significantly more than legacy luminaires was a disincentive to Local Government investment to accelerate replacement of old luminaires).

- Technical performance evaluation and engagement with customers (Local Governments) prior to introduction of new lighting types
- More comprehensive service standards for street lighting to include lighting levels and spillage (rather than just on or not)
- Repair performance measurement for cable faults, with potential for performance standards
- Option for smart lighting controls and advanced metering with customer data access
- Introduction of night-time inspection (as required in AS:1158 or at some other scope and frequency)
- Invoicing for operating lights only
- Transparency and consistency of costing / pricing (including valuation of the Regulated Asset Base and components of operation, maintenance, and renewal by luminaire type)
- Contestable public lighting maintenance services
- Optional, integrated Local Government owned and operated public lighting.

Local Governments continue to support these changes, particularly those around invoicing for operating lights only and enhanced transparency and consistency in costing / pricing.

Additional requirements identified are an opt-in pathway for dark-sky compliant LEDs ( $\leq 3000K$ , full cut-off) in rural towns, better complaint management, the provision of published tariff structures, and clearly defined delivery timeframes.

## **Public Lighting Code**

A Public Lighting Code included within the Access Arrangement offers one approach to defining and implementing service standards. A Public Lighting Code would include,

- minimum service standard
- negotiation to introduce new public lighting products
- guaranteed service levels and penalties / incentives
- information provision on public lighting data

The Public Lighting Code was recently rescinded in Victoria but updated in New South Wales.<sup>4</sup> Local Governments support the inclusion of public lighting standards in AA6 or the adoption of a Public Lighting Code as a mechanism to more tightly regulate minimum service standards, inform adoption/uptake of new technologies, and apply penalties and incentives. The conflict between lighting and trees should be considered in the code to ensure that both canopy and lighting outcomes can be achieved. This code would remain under ERA oversight, would require annual/quarterly reporting by Western Power, and could consider Local Government input and regular consultation.

## **Targeted Underground Power Program**

The benefits of underground power are significant, both for Western Power and Local Governments. Local Governments seek the opportunity to increase tree canopy on public land, in support of the WA Government Urban Greening Strategy<sup>5</sup>, reduce tree pruning costs and improve power supply reliability particularly during storms. The current regulatory arrangements enable Western Power to include a range of cost savings including avoided maintenance in proposing the capital costs it is able to add to the regulatory asset base. Less certain is the way in which other benefits that accrue to Western Power are quantified including improved safety and reliability, and the ability to enable distributed energy resources (solar panels) to be connected and increased demand (from EVs and

<sup>4</sup> [New South Wales Public Lighting Code](#), July 2024 Accessed 12 January 2026

<sup>5</sup> [Urban Greening Strategy Whadjuk \(Perth\) and Bindjareb \(Peel\) 2026](#)

electrification of households and businesses) to be met. These benefits are substantial and should be used to reduce the burden of funding underground power borne by households and other property owners or Local Governments. AA6 could also consider approaches to ease the primary constraints to the underground power program: cost inflation and shortage of human resources (both internal to Western Power and external – contractors and subcontractors). The access arrangement may also be a vehicle to rethink the approach to underground power programs to provide equity for underprivileged areas.

Local Governments identified several potential actions to address deliverability constraints. Among several suggestions, the key recommendations were to implement transparent unit rates, rolling program governance and output-based adjustment. The Access Arrangement should also require greater flexibility in project staging and pricing, enabling improved alignment between Local Government capital works programs and network service provider schedules, along with clearer and more prescriptive provisions relating to shared trenching, asset relocation, and treatment of non-standard works.

Local Governments also expressed support for underground power programs to accelerate the development of urban canopy and, secondarily, as a climate response and human health priority. Consideration of higher density and mixed-use commercial areas was also identified as a higher priority for underground power by Local Governments. The high-level scoping and coordination around designated growth areas should be considered as core business for Western Power, rather than passing these often significant costs to Local Governments.

## 2. Changes to Reference Services/Tariff Structures

### **Move or Remove Electricity Distribution or Transmission Equipment**

Local Governments, more than any other sector require Western Power to move or remove electricity distribution infrastructure to facilitate land development, road construction, and a range of other projects. The very long timeframes associated with moving this equipment is reportedly typically more than 18 months. Local Governments recommend that the ERA add standard relocations to the list of covered services and should include published pricing principles and service standards, potentially with consideration of the scale of benefit to the wider community or increased pricing based on urgency. This may help to address extended delivery times that have persisted since 2021 and reduce cost uncertainties. Including Service Level Agreements for quotes and delivery, standard unit cost ranges for typical relocation tasks, maximum timeframes and penalties for delay, and an accredited contestable pathway for straightforward works to relieve bottlenecks are some important elements to consider in AA6.

Additionally, allowing an “Option B” type approach, whereby Local Governments could engage approved consultants to undertake design and costing, would speed up the process significantly. This approach would also support more competition in this area, resulting in lower costs.

Local Governments also indicated a desire to have a dedicated Western Power contact for each Local Government for consultation on upcoming projects and as a point of contact for queries, updates, and assessments. This would enhance the working relationship between the two entities help resolve conflict.

### **Reliability**

The reliability of Western Power services is of critical importance to Local Governments. As such, Local Governments would welcome the addition of reference services that support distributed, smaller-scale electricity generation across regional areas to allow for a more resilient network and reduce outage times.

## EV Charging Stations

Services to support and incentivise the development of EV-charging stations would also be supported by Local Governments. Local Governments indicated that the tariff structure discourages public chargers where utilisation is low. Possible improvements might include reduced demand-based charges and a specific tariff per Local Government for publicly accessible chargers. For regional areas, a rural EV tariff structure that offers incentives for use off-peak might be an applicable approach.

## LED Replacement Service

Local Governments identified several critical ideas to consider in terms of specifying LED replacement, which are listed below.

- Specify standard per-unit rates by luminaire/pole class with itemised cost build-ups,
- prohibit accelerated depreciation recovery unless expressly agreed,
- permit contestable bulk replacement (Option B) subject to Western Power acceptance testing, and
- require quarterly volume/backlog reporting.

## Vegetation Management

Western Power charges and service levels for tree pruning around power lines is a fraught issue for Local Governments. Including vegetation management as a regulated (covered) service with transparent unit rates, pricing bands for typical vegetation types/access conditions, published risk maps/pruning cycles, and requirements for joint planning/notification that support increased canopy and underground power programs in the AA6 offers the opportunity to incentivise efficiency. Publishing unit costs for vegetation pruning must account for a myriad different situations and adopting a fixed unit cost by span/risk tier approach with variance for special constraints is suggested, whilst an appeals process in instances of inadequate notification could also be considered. Costs (actuals vs estimates) should be reconciled annually to prevent inflated charges. Additionally, Western Power should be provided incentives / penalties to develop alternative design solutions that minimise costs.

## 3. Metering Services Changes

Local Governments identified advanced metering as an opportunity to monitor energy consumption, with the intent of increasing consumption when energy is plentiful and reducing or changing energy source, when consumption is high and costly during peak periods. This will help to ensure better grid stability and support the increased utilisation of renewable energy. Western Power could even consider developing an online platform, which would provide detailed information regarding energy consumption and energy consumption source. This type of readily accessible information could empower consumers of electricity to be more conscious of their electricity use.

## 4. Payments for Services Improvements

Most new and upgraded residential connections are priced under the [Distribution Low Voltage Connection Scheme](#). This Scheme calculates charges based on requested capacity (kVA) rather than on whether the current network will have to be expanded due to the submitted application and so allows for the cost of infrastructure required for new customer connections to be shared by all customers using the installed network. However, the Scheme does not apply to residential connections more than 25km from the nearest Western Power zone sub-station. As part of AA6, it is recommended that the criteria, including distance, used to determine eligibility for the Distribution Low Voltage Connection Scheme be reviewed.

While the Scheme may disperse the cost of network expansion in urban areas near sub-stations, in regional areas outside of 25km from a substation, the connection costs are exceptionally high (anecdotal evidence suggests that connection costs in urban areas may be on the order of \$1,000 in some instances, while regional areas may experience costs up to \$35,000 per connection). This severely disadvantages housing development in regional areas already experiencing significant housing shortages. Local Governments support the AA6 exploring solutions to reduce this disparity and the connection costs overall.

The complexity and context of Local Government projects often differ substantially, which can make providing a standard service cost or uniform unit rate difficult. This is pertinent to vegetation management and the movement of electricity distribution or transmission equipment among other areas. One suggested approach could be to use a risk-based or stratified approach. While the context and complexity of projects will likely differ, providing some level of transparency in terms of cost (e.g. pricing bands for typical vegetation types/access conditions) and timeline is essential to support grant applications and budget planning.

## **5. Disaggregated Service Standards/Improvement to Service Standards**

### **Reliability**

The reliability of Western Power services is of critical importance to Local Governments. Wait times for reconnection in regional areas often massively exceed the maximum outage timeframes, which requires urgent action. However, as identified in the issues paper, reporting at the aggregate level may obscure results for specific areas. Utilising more granular geographical reporting areas, e.g. at the Local Government or suburb/locality level, would support clearer identification of issues and support tailored service standards for reliability.

Local Governments would also support the integration of penalties for poor performance into outage time KPIs.

### **Standalone Power Storage Facilities**

As significant weather events become more frequent, investment in distributed, standalone power storage facilities in regional areas will be critical to maintaining customer access to power at times when feeder connections may be affected. This is particularly relevant in areas with long feeder services. Local Governments should be involved in the siting of such storage facilities and play a role in the integration of standalone power storage with local emergency response services. Requiring the development of Local Area Plans in coordination with the relevant Local Governments to prioritise sectioning of the network, automation, community batteries, and standalone power storage would go some distance to improving reliability in regional areas.

By the same token, areas of the SWIS are highly suitable for the generation of renewable energy. Ensuring that the energy can be efficiently stored and utilised, thus increasing the dispersal and reliability of power supplies, should be an area of focus for AA6. The provision of and support for community batteries in new subdivisions may be a method for power storage to improve network resilience. Technologies to implement standalone power storage, particularly in remote areas with high renewable energy potential should be of particular focus.

### **Wait Times**

Residential and commercial connections have very long wait times for connections, with 75% of connections completed in 13 months or between 9-19 months, respectively. This can lead to long delays in project delivery and is a critical area to improve in AA6. The AA6 should consider mandatory time standards for standard single and multi-residential connections. Local Governments

highlight that costs for Design Quotes are a significant and in regional areas are a further barrier to development, particularly where land development market failure is clearly evident. It is essential for AA6 to strengthen incentives and implement accountability mechanisms to significantly reduce response times, potentially through consideration of the benefit to the wider community as a key metric.

## 6. Changes to Price Controls

As the uptake of 5G devices continues, WP is likely to realise additional revenue from telecommunications providers using electricity distribution infrastructure including power poles and streetlight poles for 5G-related equipment.

The Electricity Networks Access Code 2004 requires that the Access Arrangement identify multi-function assets that provide both regulated (covered) services such as streetlighting or electricity distribution and unregulated (uncovered) services such as telecommunications services.

Furthermore, each access arrangement must contain a multi-function asset policy, and target revenue for an access arrangement period must be reduced by 30 per cent of the net incremental revenue earned by multi-function assets during that period. However, it is not clear whether this reduction in target review applies to Western Power as a whole or is credited to the service such as streetlighting that is otherwise meeting the costs to operate, maintain and renew those assets. While incentives for WP to increase asset utilisation should be maintained, these benefits should be shared with customers funding these assets. One possibility might be to include free/open Wi-Fi as part of the Agreement for locating telecommunications on Western Power infrastructure.

One option to consider is retaining the Investment Adjustment Mechanism, but tying it to outputs (km undergrounded, # properties converted, # LED streetlights installed) with transparent unit rates and delivery reporting, so Local Governments are only paying for outcomes that have actually occurred.

## 7. Management of Uncertainty

The recent reemergence of Option B for streetlighting, which allows Local Governments to utilise Western Power-approved contractors for streetlighting projects, highlights the need for a self-service option to allow Local Governments to accelerate the delivery of critical infrastructure in a timely fashion. Including Western Power approval and connection process timeframes in the Option B approach would only serve to make the option more attractive. By expanding this option, Local Governments can help to reduce or disperse project management costs and ensure prompt project delivery.

## 8. Other Critical Issues

### Asset Management

The condition of the regional network is unclear to Local Governments and transparency by Western Power as to the condition of the network would provide Local Governments with some understanding of when intervention (with associated costs and coordination requirements) will likely be necessary.

This is of particular concern in relation to transmission lines. Anecdotal evidence suggests that line breaks are becoming more common, highlighting the need for better asset management practices around the maintenance of transmission lines. Local Governments support the establishment of a transmission line asset inventory and schedules for the replacement of transmission lines.

## **Pole-top Fires**

Pole-top fires are a significant issue for Local Governments, particularly in areas with high bushfire risk. Local Governments welcome the recent trials on the use of insulated wires and would support strategic initiatives to continue to implement insulated wires in areas with significant bushfire risk as a budgeted priority. Increasing the use of insulated wires would substantially strengthen the power network in areas outside of the Targeted Underground Power Program boundary.

Local Governments would also like an understanding of which poles are most at-risk for pole top fires, as this will support efforts to mitigate fire risk in bushfire-prone areas. A risk-modelling approach would also be welcome to support silicone treatments/protective insulator treatments and the accelerated asset renewal of at-risk poles. In instances where pole-top fires have occurred or the pole is significantly at risk of a pole-top fire, Local Governments would support the use of different types of poles/more fire-resistant poles (e.g. steel poles) to reduce the future risk of pole-top fires. Reporting on pole-top fire frequency and outcomes in an annual report would also be helpful.

## **Western Power Project Portal**

Local Governments suggest that the current project portal be upgraded to include more detailed timeline information broken down by phase, information on how to effectively escalate issues, records of key communications and actions taken in relation to the project, and breakdowns of cost and effort. This will enhance transparency and accountability for both parties.

## **Local Government as Special Customer Recognition**

Local Governments have a unique relationship with Western Power; this fact should be recognised through by accelerating the delivery of service relocations that impact on Local Government projects.

## **Conclusion**

In this submission, Local Governments have identified transparency in costings, better breakdown of billings, more robust KPIs in relation to timeframes, and better stakeholder relationships as cross-cutting recommendations for improvement in AA6.

WALGA appreciates the opportunity to comment on the framework and approach for AA6. At such time when the framework and approach is released for further comment, WALGA would greatly appreciate the opportunity to undertake further consultation with Local Governments and provide comment.