Economic Regulation Authority

Framework and approach for Western Power's sixth access arrangement review

Summary of submissions received on draft decision

17 August 2026

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Table 1: Expectations for approach and content of Western Power's proposal

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Section 2.2.	**Western Power** Supports the ERA's proposed principles for AA6. However, considers there is a careful balance that needs to be considered between the benefits of reporting and publication of information for the users of this information, and the potential administrative cost and regulatory burden that this would place on Western Power (with these costs ultimately being borne by consumers).
Section 2.2.	**Alinta** • Recognises Western Power's task of planning and operating the network is becoming increasingly complex and considers responding to these challenges requires a co-ordinated and forward looking plan. • Supports the requirement for Western Power to set out a clear long-term network plan and recommends the plan: – Integrates with whole-of-system planning, including the Whole of System Plan (WOSP), to ensure alignment with demand forecasts, network constraints, and government energy and emissions objectives. – Explicitly addresses forecast demand and cost drivers, including EVs, DER and data centres, and: – quantifies the potential cost and operational impacts of uptake under the status quo (and without coordination); – sets out how tariffs, services and non-network solutions could manage these impacts efficiently. Where tariffs would not be effective (for example due to retail price regulation), this challenge should be highlighted so that alternative measures can be considered. – Clearly identifies other material challenges and links these to specific, deliverable responses, including timing, dependencies and uncertainties. • Supports the requirement that Western Power clearly justifies cost increases, including for new functions such as the Distribution System Operator role. In particular: – Proposals should demonstrate that costs have been minimised and benefits to consumers are clear and measurable – There should be caution against overly complex or speculative projects, particularly those requiring step changes in market structure or behaviours (e.g. large-scale DER participation or VPP uptake), where enabling preconditions are not yet in place and structural constraints (such as retail market concentration in residential segments) may limit effectiveness.

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	– A pragmatic, staged approach will better support efficient outcomes and reduce the risk of premature or inefficient investment.
Section 2.2.	**Australian Energy Council** • Notes there are currently multiple inconsistent system and transmission planning reports published for the SWIS, which creates uncertainty and makes it difficult for stakeholders to assess whether Western Power's proposed expenditure in the AA6 period is efficient and fit for purpose. • Considers it is now timely for Western Power to use the AA6 process to articulate its plan for developing the network over the next 15 to 20 years to meet the evolving needs of the SWIS. This plan should outline what the network requires and when, how the network upgrades will be delivered, what challenges are envisioned, how the AA6 proposal fits within this broader plan, and what can be realistically delivered during the AA6 period. Considers this would provide clear direction and investment signals, help Government and industry understand the priorities, and support the ERA's evaluation of Wester Power's efficient and prudent expenditure. • Considers there needs to be better alignment between government policies, planning initiatives, and the Access Arrangement, noting that Western Power is preparing for the AA6 period in isolation without a current Whole of System Plan or an overarching plan for the energy sector that identifies a central transition pathway and guides network planning. In the absence of Western Power producing a longer-term plan, considers this gap makes it difficult for the ERA to meaningfully assess whether Western Power's investment, service delivery and cost recovery occurs in a manner that is efficient, prudent and aligned with the long-term interests of electricity consumers. • Considers the misalignment between the Access Arrangement and planning process could be addressed by requiring Western Power to prepare its AA6 proposal against a clearly defined system-wide planning baseline. Establishing such a baseline would reduce the potential for Western Power to develop its Access Arrangement proposal in isolation from whole-of-system priorities and would improve transparency for stakeholders, strengthen accountability for major expenditure proposals, and help ensure that AA6 supports the efficient coordination across generation, transmission, distribution, demand-side resources and emerging technologies. • Notes the absence of a single, commonly accepted system plan and central transition pathway creates uncertainty for stakeholders and makes it difficult to assess how the network will develop to support the energy transition.
See section 2.2.	**Synergy** • Considers the information Western Power provides should assist network users, customers, investors and the ERA to understand what is changing, why it is changing, what it will cost, who will pay, and what outcomes will be delivered. • Considers the central organising principle for Western Power's AA6 proposal should be a clear line of sight between: – the challenges and objectives being addressed;

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	– the services, tariffs, incentive mechanisms and investment programs proposed; – the options considered, including non-network solutions and capital versus non-capital alternatives; – the costs to be recovered and the customers or network users who will bear those costs; and – the customer, network user and whole-of-system outcomes expected to be delivered. • Recommends Western Power provide a credible 15- to 20-year network plan with a costed pathway for AA6 and beyond, including demand, DER, EV and electrification forecasts; material network constraints; major network and non-network solutions; indicative cost and tariff impacts; delivery capability; and a process for updating the plan as policy and market conditions evolve. • Recommends Western Power's AA6 proposal include a clear retrospective of AA5 delivery, identifying material expenditure and deliverables proposed for AA5 but not delivered, the reasons for any material variance and lessons for AA6. • Recommends the AA6 proposal include a forward-looking investment pipeline identifying major programs and projects, confidence in delivery, key dependencies and constraints, options analysis including non-network solutions, transparent forecasting and cost allocation assumptions, tariff impacts, deliverability assessment, reporting arrangements, and clear output and outcome measures. • Considers strategies required for AA6 should be operational rather than aspirational, and should identify the issue being addressed, the actions Western Power proposes to take, timing, resources or expenditure required, service or tariff changes, expected outcomes, performance measures and reporting arrangements. • Considers the proposed strategies should be submitted with, and assessed alongside, Western Power's proposed expenditure, tariffs, service standards and adjustment mechanisms, so they can be tested as part of the AA6 review rather than treated as separate planning documents.
See sections 2.2, 8, 11 and 12.	**WA Expert Consumer Panel** • Welcomes the future-oriented direction of the draft decision, including the ERA's focus on affordability, reliability, consumer control, climate resilience, emissions reduction and environmental considerations in Western Power's planning and investment decisions. • Considers Western Power must continue evolving from a passive network owner into a more active, customer-centric distribution system operator that can optimise consumer-owned assets, including rooftop solar, batteries and other distributed resources. • Supports the ERA requiring Western Power to demonstrate how environmental impacts, emissions reduction and climate resilience will be assessed and balanced against cost and reliability.

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	• Supports the ERA's requirement for robust options analysis, including active consideration of non-network and lower-cost alternatives. • Supports the ERA requiring strategies for critical customer-facing areas such as EV charger facilitation, connection processes and local area planning, but considers these strategies are largely procedural unless supported by stronger incentives, independent review and clear accountability mechanisms.

Table 2: Classification of services

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Section 3.2.	**Western Power** Agrees the classification of services does not need to change.
Section 3.2.	**Synergy** Does not object to retaining the current classification of services.

Table 3: Reference services and tariffs

Section of final decision – explanatory statement	Stakeholder submission
Tariffs for residential customers with and without distributed energy resources	
Section 4.1.1	**Western Power** Accepts this proposal and notes that pricing reviews are undertaken through the review of the cost allocation process.
Section 4.1.1	**Synergy** Supports tariffs being more cost reflective. However, cost reflectivity should not simply default to higher fixed charges for DER or bidirectional customers without a clear explanation of the underlying cost drivers. If different tariffs are proposed, Western Power should be required to explain the basis for the difference, the customers affected and the expected bill impacts.

Section of final decision – explanatory statement	Stakeholder submission
Grandfathered residential and business time-of-use tariffs	
Section 4.1.2	**Western Power** Supports the proposal.
Section 4.1.2	**Synergy** Has no objection to removing the grandfathered pre-AA5 time of use tariffs at the commencement of AA6.
Section 4.1.2	**ECP** • Supports the proposed phase-out of grandfathered residential and business time of-use (ToU) tariffs. • But considers the ERA should also evaluate a phase-out program for traditional flat network tariffs which are not structurally cost-reflective.
Structure of demand-based business/industrial tariffs	
Section 4.1.3	**Western Power** Preferred approach is to close the metered demand tariffs (i.e. RT5 and RT6). There are several drivers for this proposed change: • Alternative tariffs exist that provide more effective signals for business and industrial consumers – namely time-of-use demand tariffs (RT36). Where a cost reflective alternative is available that meets customers' requirements, there is no further requirement for multiple tariff options. Fewer tariffs support simpler pricing, cost allocation, and transparency. • The discount component of the metered demand tariff is based on obsolete time bands and at present there is no clear evidence that this is effective at shifting demand nor that it is cost reflective. The improved discounting mechanism (see the below section) will suitably reflect locational benefits that may be realised from load shifting. • The line length component of these tariffs is complex and the locational variation in cost of service for these customers is negligible (or otherwise captured by the improved discounting mechanism explained in the next section).
Section 4.1.3	**Synergy** Supports restructuring the demand-based business and industrial tariffs to shift demand away from peak periods but should be supported by an assessment of impacts on affected customers and designed so that it can be practically reflected in retail product offerings.

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Section 4.1.3	**ECP** Considers the proposed restructuring of demand-based business and industrial tariffs to calculate charges on monthly peak-period demand will significantly improve incentives for load-shifting and localised DER investment.
Network tariff where users lower network costs	
Section 4.1.4	**Western Power** Supports the draft decision requiring the discount rates used for reference services relating to entry and bi-directional services to facilitate distributed generation or other non-network solutions should be published in Western Power's network opportunities map.
Section 4.1.4	**AEC** • Supports the proposal that discount rates should be published in Western Power's annual network opportunities map. • But considers this should not be the sole mechanism for providing transparency. For these services to operate effectively, the discount methodology should be specified in the relevant reference service and the applicable discount value should also be published in Western Power's price list, with Western Power required to work with customers to identify any cost savings. • Considers this would provide greater certainty to network users and better enable embedded generation, orchestrated DER and other non-network solutions to be deployed where they reduce network expenditure. • Considers that, if a user is reducing efficient network spend, that user should receive a clear and predictable financial benefit.
Section 4.1.4	**Synergy** Considers the current framework does not adequately enable or require Western Power to identify, value and use non-network solutions, and should be strengthened so that non-network solutions can actively compete with network investment and users that lower network costs can realise those benefits. Synergy considers: • the framework should require Western Power to actively assess non-network solutions • network users should be able to respond to identified constraints, not discover them themselves • discount mechanisms must be: – transparent

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	– predictable – usable in practice • current arrangements place too much burden on the user to prove the benefit.
Sections 4.1.4, 6.2.3 and 10.2.	**Zenith** Supports mechanisms that better recognise the contribution of microgrids and other non-network solutions in delivering system benefits. This includes transparent reporting and assessment of non-capital expenditure used to defer or avoid capital investment.
Modifications sought by Synergy	
Section 4.1.5	**Synergy** • Is seeking more development on the following services raised in its response to the issues paper: – vacant site ancillary reference service – workable EV tariffs – refinements to community battery services – capacity sharing services – avoided transmission use of system (TuoS) arrangements for embedded or distribution connected generation – greater transparency of non-reference services – further changes to distributed generation and non-network solution services so that they can be used effectively by retailers and customers. • Emphasises that services must be operable in practice, meaning they can be acquired, reflected in retail products and understood by customers; otherwise they will not deliver intended outcomes. • Recommends the final decision either addresses these matters directly or requires Western Power to do so expressly in its AA6 proposal.
Modifications sought by the ECP	
Section 4.1.6	**WA Expert Consumer Panel** • To maximise the value of these changes, the ERA should explore mechanisms that ensure Synergy is charged the most cost-reflectively structured network tariff for each customer that aligns with better retail price signals, such as

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	Synergy's "Midday Saver" tariff even if the customer is not on that retail tariff. This alignment would provide the retailer with a realistic and actionable network price signal to actively soak up low-cost solar generation and alleviate grid congestion. • More efficient outcomes would eventually result from retailers being charged the most cost reflectively structured network tariff that each customer's meter can accommodate irrespective of the retail tariff being applied to the customer. With advanced meters, there is no longer a need for the structure of the network tariff to match the structure of the retail tariff, and so flat, energy-based network tariffs can be phased out as they are not, and cannot be made structurally cost-reflective for each customer.
Licensed microgrids	
Section 4.1.7	**Zenith** • Description of the Zenith microgrid business model: – Holds distribution and retail licences that apply to the microgrid. – Typically deployed in locations where forecast load growth exceeds economically available Western Power network capacity. – Zenith secures economically available network capacity, with local load growth underwritten by local generation, battery storage and load control to be an active, vertically-integrated end-user engaging in flexible system operations, reliant in each case on a "skinny" connection to the Western Power network. – While there are similarities between other types of microgrids and embedded or nested networks, Zenith considers its microgrids' licenced status and integrated, flexible system operative characteristics which are intended to operate behind capacity constrained connection points means there may be particular characteristics of the covered services required of Western Power and the regulatory settings for one will not automatically be appropriate for another. • Considers the AA6 framework should not treat licensed microgrid operators as ordinary load customers or as passive behind-the-meter assets: – Licensed microgrids operate distribution, generation and storage assets, manage customer-facing supply and reliability obligations, and can provide flexibility and system support in a way that is functionally closer to a local distribution system operator. – The framework should require Western Power to develop its AA6 submission having regard to the distinct operational role of licensed microgrid and other licenced network operators, which may be interconnected with

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	the Western Power network and ensure that any changes to access, connection, tariff, control or data arrangements preserve non-discriminatory treatment and do not undermine existing customer-side investments. • Reference services and tariff structure: – Notes reference services and tariffs also provide a standard or benchmark for non-reference service negotiations. – Considers Western Power should be required to: – ensure that its reference services do not entrench or create discriminatory treatment of licenced, interconnected networks; or – expand reference services to include a specific reference service tailored for licensed interconnected networks which account for the system operational characteristics of microgrids. This would address the unique operational needs for entities like ours, which are not passive loads but instead manage customer-facing systems, embedded generation and storage. Eligibility criteria across other reference services should ensure that any targeted reference service is not mandatory but can be utilised by licenced distributors and network operators, where appropriate. – When developing reference services and standard contracts, Western Power should consider the customer/ network-to-network hybrid character, identifying and minimising terms that may contractually limit or hinder licenced network operators from managing local systems, consistent with good electricity industry practice, or which do not accurately reflect the “interconnecting networks” character of the arrangement. It provides specific examples of issues it has identified. • Notes that the regulatory framework does not expressly contemplate interconnection arrangements between licenced distributors, seeing the connection being between Western Power as the incumbent network operator and its customer installations. – Considers this is not unusual and is generally consistent with the approach adopted in the NEM and the United Kingdom where interconnected distribution systems are typically addressed by reciprocal connection agreements and bilateral arrangements. – Considers what is unusual in Western Australia are the different regulatory treatment of entities when it comes to network design, as flagged above, and as Western Power moves to a more DER integrated model with DSO function, formalised by the Electricity System and Market Amendment (Tranche 9) Rules 2025. – Notes the F&A draft decision requires Western Power to produce a transition to DSO strategy. Zenith supports this requirement and would like it to take an approach that prioritises agreement and an acknowledgement that licenced interconnected networks have their own regulatory obligations in relation to network quality and reliability, despite Western Power having a centralised DSO function and noting also the terms of access, for

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	example, the reasonably expansive curtailment rights at clauses 16.3 and 25 of the current approved ETAC for AA5.
Additional changes proposed by Western Power in its response to the draft decision	
Section 4.1.8	**Western Power** **Grid connected EV charger tariff** • Closure of the dedicated EV charging tariff (RT40/41). Lower than anticipated uptake of these tariffs indicates that a technology-specific tariff is not required for dedicated EV chargers. While the availability of EV chargers has grown in recent years, most customers with EV chargers are on alternative tariffs, primarily time-of-use tariffs. • Notes its position that it supports technology neutral tariffs so that technologies compete on their merits. Where technology-specific tariffs are considered, the benefits and costs for customers who do not adopt the technology should be carefully assessed. **Distribution connected storage tariffs** • Amend the eligibility criteria as follows: – The connection point will be used for the primary purpose of a storage activity ~~and may also be used for other purposes ancillary to a storage activity.~~ • Notes this tariff is intended for community batteries owned or leased by retailers. Western Power generally contracts directly with the retailer utilising these tariffs and as such, understands there may be some other small consumption to power lights, communication devices and other activities required to perform the purpose of storage. However, this change clarifies to customers and retailers that the tariff is not intended as another option for customers with behind-the-meter storage, regardless of the relative size of the storage compared to the 'standard' load. This change supports our position to simplify the tariff list to a well-defined and clear set of network tariffs that serve customers' needs. **Don't allow HV customers to choose LV tariffs** • Restriction of low voltage (LV) energy-only tariffs (RT2, RT14, and RT34) to LV connected customers, to prevent the churn of high voltage (HV) customers to these LV tariffs, which are not set to recover costs of HV customers in this way. Currently some HV customers churn to LV tariffs without a corresponding change in load profile and in this way avoid paying their reasonable share of network costs.

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	• Western Power recognises this change to eligibility was introduced in AA5 to allow some large customers on the (rolling 12-month) metered demand tariffs to avoid punitive network charges during periods when they are not operating – for example, during extended maintenance or vacancy. Under the proposed changes by the ERA or Western Power's proposal in this paper (for example, through the use of time-of-use tariffs) this is no longer an issue as these customers will be billed on the monthly metered demand quantities instead.
Metering services	
Section 4.1.8	**Western Power** • Will propose updated metering prices in its access arrangement proposal. • Considers AA6 could be a timely opportunity to consider the need for and timing of a review of the model service level agreement and is open to initiating a review pending feedback received through the AA6 process.
Section 4.1.8	**Zenith** • Considers the accelerated rollout of advanced meters presents an opportunity to improve operability for sophisticated network users, including microgrid operators. • Recommends metering services are designed to support customer-side coordination and avoid unnecessary process or data barriers. • Advanced metering infrastructure (AMI) should enable timely access to metering and operational data, which is essential for DER integration and network optimisation. Metering costs must be fair and not disproportionately impact consumers. • Supports rationalising metering services to leverage the benefits of AMI while maintaining a choice of services.
Cost allocation for revenue target services	
Section 4.1.10	**Western Power** • Notes the cost allocation will be undertaken as part of the tariff structure statement review. It considers the following factors will support the review of cost allocations: – A well-defined set of tariffs aligned to distinct customer segments, and eligibility criteria that reflect how customers use network assets. – Clear eligibility criteria should be sufficiently targeted to ensure costs are recovered from those customers who drive network demand and investment. Customers may move between tariffs over time, and this is appropriate where it reflects a genuine change in demand profile and network usage. However, where eligibility criteria are

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	overly permissive and allow movement without a corresponding change in usage, this can weaken the link between tariffs and underlying costs, increasing the risk of cross-subsidisation between customer groups. – The ability to update forecasts throughout the period to reflect the latest actual usage of network assets, instead of basing this on outdated forecasts. • In relation to Alinta's submission about transmission entry service tariffs – Western Power states that compliance with the pricing principles is demonstrated in the Appendix of each price list. Notwithstanding this, cost allocations will be reviewed for the AA6 proposal.
Section 4.1.10	**Alinta** Considers that the transmission entry service tariffs may not be consistent with the pricing principles in the Access Code because: • Generators fund the cost of their connection, including a portion of the shared asset costs and once connected, there is no material cost to the network in continuing to permit injection, particularly since the implementation of security constrained economic dispatch where access is non-firm and subject to curtailment. • As recognised in the NEM, where generators do not pay transmission use-of-system (TUOS) charges. The NEM framework recognises that transmission investment is primarily driven by demand. • Generators already pay a form of locational costs through loss factors and constraints that discount their energy revenue.
Section 4.1.10	**Synergy** • Its most significant concern about cost allocation is the allocation of costs between transmission and distribution users. Synergy notes it bears the full cost of network services for its residential and small business customers, almost all of whom are distribution-connected. In the context of significant transmission augmentation over the next 15 to 20 years, the way those costs are allocated is commercially significant for Synergy and important for customers. • Synergy welcomes the ERA's draft decision requiring Western Power to submit detailed cost allocation information as part of the AA6 review. However, Synergy recommends the ERA's final decision on the F&A goes further by setting the principles Western Power must apply in developing its cost allocation proposal. In particular, Western Power should be required to apply causer-pays and no-default-cross subsidy principles and to explain how each major program or project is allocated between transmission and distribution network users. • Synergy also recommends the ERA's final decision on the F&A requires greater transparency of pricing and charging. Network users need to understand the split between fixed and variable charges, the drivers of those charges, and how transport costs are reflected. That information is necessary for Synergy and other network users to manage costs, assess tariff impacts and, where appropriate, reflect network charges in customer offerings.

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	• Synergy is also concerned about distinguishing between network and market related costs. As the market evolves, Western Power may incur costs associated with new functions, including DSO related activities and market-facing services. Synergy supports the ERA requiring Western Power to explain how those costs will be attributed between regulated network services and any market-based services. • Considers this is important for customers and network users. Only efficient costs properly attributable to regulated network services should be recovered through network tariffs. Costs associated with market-facing services should be recovered through the appropriate market or service-specific mechanisms. Synergy recommends that the ERA's final F&A decision require Western Power to provide clear cost attribution for any new or expanded functions in AA6. That should include explaining the activity, the cost driver, the proposed recovery mechanism, and the controls that will prevent double recovery between network tariffs and market-based charges.
Pricing of non-revenue target services	
Section 4.1.11	**Western Power** Will provide a full list of all non-revenue target services together with the basis of pricing for each service in its access arrangement proposal.

Table 4: Service standards

Section of final decision – explanatory statement	Stakeholder submission
Setting the benchmarks	
Section 5.2.1.	**Western Power** • Considers a single set of measures cannot effectively serve both service performance incentive and compliance purposes. Western Power is proposing two sets of measures for these two different purposes, 'service compliance levels' for assessing compliance with section 11.1 of the Access Code and 'expected service performance' measures for the service standard adjustment mechanism. • Proposes that the measures for Rural Long reliability performance should be based around the forthcoming regional reliability plan. Considers this would meet the requirements the NQRS Code to meet the prescribed so far as is reasonably practicable.

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Section 5.2.1.	**Synergy** • Supports retaining the current approach to service standard benchmarks and rejecting weaker definitions
Sections 5.2.1 and 6.2.3.	**WA Expert Consumer Panel** • Endorses the ERA's draft decision to maintain service standards and performance definitions but considers greater clarity is required in the final framework to ensure Western Power delivers a robust regional reliability strategy. Considers the Framework and Approach would benefit from a stand-alone section dealing with regional reliability issues in greater detail and that Western Power should be required to develop and submit a detailed Regional Reliability Plan, building substantially on the reliability improvement plan "pilot areas". • Notes continuing poor performance in the regions and considers that, to close this regional reliability divide, Western Power must actively utilise newly proposed regulatory mechanisms. Under a combined investment and operating expenditure adjustment mechanism, the networks can deploy operating expenditure-based solutions, such as flexibility services and Stand-Alone Power Systems (SAPS), where traditional capex replacement is not cost-effective.
Disaggregated service standard benchmarks	
Section 5.2.2.	**Synergy** • Agrees averages can mask poor service and supports more disaggregated reporting.
Definition of sustained interruptions	
Section 5.2.3.	**Western Power** Continues to consider that amending the definition of a sustained interruption to be greater than three minutes would incentivise further automation, improving reliability performance for customers. Notes that interruptions of between one minute and three minutes could continue to be reported.
Call centre performance	
Section 5.2.4.	**Western Power** Continues to consider there should be additional exclusions for major event days and force majeure events for the call centre performance service standard benchmark.

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Metering services	
Section 5.2.5.	**Zenith** Considers service standards and applicable timelines for Western Power's services to other licenced networks should take into account that networks are subject to a variety of regulatory obligations, including in respect of security and reliability of supply. Timeline delays do not just present project-related risks as it would for typical large customer connections, it also undermines the licensed network's ability to meet its statutory obligations.
Western Power advised that the owner of the property is responsible for securing the meter box. Tenants need to contact their landlord about any issues.	**Customer** Difficulties experienced in multi-unit rental properties where the meter box is not secure.
Streetlighting	
Sections 5.2.6 and 7.2.	**Synergy** Identifies streetlighting as a clear example where average performance measures can mask poor customer outcomes.

Table 5: Price control, incentives and adjustment mechanisms

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Price control	
Section 6.2.1.	**Western Power** • Western Power does not consider that demand-related risks can be fully managed through forecasting, planning and operational responses alone. It argues that, under the current modified revenue cap, key demand inputs are fixed at the start of the access arrangement period and revenue outcomes can diverge materially from forecasts because of factors outside Western Power's control.

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	• Western Power identifies three key sources of uncertainty that it considers are difficult to forecast using historical demand models:
	  – large block loads, including major transmission-connected loads, where timing, scale and load profile are uncertain
	  – electric vehicle uptake and charging behaviour
	  – distributed battery uptake and associated impacts on energy consumption, demand and time-of-use patterns.
	• Western Power says these drivers are currently treated through post-model adjustments informed by external forecasts and scenarios, but considers these adjustments cannot fully account for emerging technologies, changing customer behaviour or step changes in demand.
	• It argues that forecast error under the current price control could lead to significant over- or under-recovery of target revenue.
	• Western Power's preferred position remains a standard revenue cap, which it says would better decouple revenue recovery from uncontrollable demand variation and customer churn between tariffs, while allowing incentives to be retained for efficient expenditure, service performance, network utilisation, DER integration and demand management.
	• However, Western Power also canvasses possible amendments within the current framework. These include periodic or trigger-based updates to demand inputs, and mechanisms to manage under- or over-recovery over time. It describes this as a potential midpoint between the current modified revenue cap and a standard revenue cap.
	• Western Power compares the current modified revenue cap, an amended modified revenue cap and an industry standard revenue cap against principles of efficient cost recovery, incentive properties, simplicity, transparency and customer price predictability. It considers a standard revenue cap would provide the strongest revenue certainty, transparency and price predictability, particularly if combined with tariff side constraints to manage annual price movements.
	• Western Power does not propose a single final design in its submission. It seeks further engagement with the ERA to develop a practical and proportionate approach that manages forecast uncertainty, maintains effective incentives and supports efficient outcomes for customers.

Section 6.2.1.	**Alinta** Supports retaining the modified revenue cap to maintain incentives for forecasting, demand-side solutions and efficient tariff design.

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Section 6.2.1.	**Australian Energy Council** • Opposes transferring demand risk to users and does not support moving to a pure revenue cap. • Considers moving towards a pure revenue cap, or otherwise transferring demand risk to service recipients would reduce the incentives for rigorous demand forecasting, proactive connection management, demand-side solutions and efficient tariff design and could also expose users to higher charges without providing them with equivalent control over the underlying drivers of those costs. • If Western Power considers that particular aspects of the energy transition create exceptional uncertainty, then any response should be tightly targeted, evidence based and limited to clearly defined circumstances, rather than weakening the overall allocation of risk. • Considers the Access Arrangement should preserve the principle that Western Power, as the owner and operator of the network, remains responsible for managing the demand-related risks associated with its regulated business.
Section 6.2.1.	**Synergy** • Supports retaining the modified revenue cap and considers it provides an appropriate balance between revenue certainty and incentives. • Considers the energy transition requires stronger forecasting, better use of demand-side options, more effective connection delivery and clearer accountability for performance so does not support a move back to a framework that reduces Western Power's exposure to risks it is best placed to manage. • If further refinements to the price control are considered, they should preserve the current allocation of demand risk and strengthen incentives for Western Power to forecast accurately and manage that risk efficiently.
Section 6.2.1. Use of independent evaluations and market participant performance surveys will be considered during the AA review and post review monitoring of progress. Process not mature enough yet for incentive payments. Consider for future but would likely need policy changes.	**WA Expert Consumer Panel** • Is open to a standard revenue cap for AA6, noting the ECP's view that decoupling revenue from fluctuating energy volumes may be a pragmatic response to the energy transition. • Considers unforeseeable changes and shocks are inherent in the current transformation, citing the battery rebate program and scale of battery uptake as examples of developments that would have been difficult to anticipate during AA5 planning. • Notes, however, that support for a standard revenue cap is conditional on stronger incentive and accountability arrangements, including independent evaluations, market participant performance surveys and potential incentive payments for DSO transition and connections performance. • Considers a shift in price control should not reduce accountability for delivering consumer outcomes or overcoming capital bias.

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Section 6.2.1.	**Zenith** Supports rejection of a pure revenue cap as this would weaken incentives for rigorous demand forecasting and efficient network solutions.
Operating expenditure and gain sharing mechanism	
Section 6.2.2.	**Western Power** • Continues to consider that the operation of the mechanism should account for over- or under-spends that happen due to factors beyond the reasonable control of a prudent and efficient service provider. • It considers capping the level of total revenue adjustment that can be made as a result of the surpluses and deficits achieved under the GSM would be one way of mitigating risks for both consumers and Western Power (including those risks outside of Western Power's control). Strong incentives on Western Power would be retained in the band between the cap and collar. • However, it notes there are alternative approaches to achieve this – including by excluding "uncontrollable costs" such as the ERA fees and Energy Safety Levy. • It is keen to work with the ERA to consider what categories of expenditure it would be appropriate to exclude from the operation of the gain sharing mechanism, particularly in the context of the introduction of an operating expenditure adjustment mechanism (or a combined investment/operating expenditure adjustment mechanism).
Expenditure adjustment mechanisms	
Section 6.2.3.	**Western Power** • Western Power continues to consider that it would likely be appropriate to include growth-related capital expenditure in an uncertainty management mechanism. It notes that growth-related capital expenditure is driven primarily by changes in peak demand whereas changes in revenue recovery are driven primarily by changes in overall energy volumes. In recent years, peak demand has been growing to a much greater extent than energy volumes. Under these circumstances, any revenue growth will tend to be outpaced by increased costs associated with the need for capacity expansion and customer-driven capital expenditure. Hence, it can still be appropriate to include growth-related capital expenditure in the scope of the IAM, even if the existing form of price control is retained. • Agrees the expenditure adjustments proposed by the ERA could be useful. • Suggests also including an "agree and release" funding approach similar to the contingent projects in the NEM. If, during the access arrangement period, the pre-defined circumstances eventuate, an additional revenue allowance would be added to the target revenue, in order to provide funding for the associated capital expenditure now required.

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	This additional allowance could be pre-set at the time of the access arrangement review, although the ERA might undertake a final review of the cost and consequent impact on tariffs. Suggests could be used for some of the Clean Energy Link programs. • Western Power will continue its work to identify projects with the most substantial uncertainty going forward, and will work with the ERA over the course of the access arrangement review process to develop the most appropriate mechanisms and identify relevant proposed categories of expenditure.
Section 6.2.3.	**Synergy** • Supports the ERA's openness to a combined investment and operating expenditure adjustment mechanism for specific projects or programs. • Considers such a mechanism could help address any bias toward capital expenditure by allowing Western Power to choose the most efficient solution regardless of whether costs are capital or operating in nature. • Considers the mechanism could support delivery of actions identified in required AA6 strategies, such as DER orchestration, demand response, connection process improvements or public lighting improvements, where those actions are prudent, efficient, measurable and in customers' interests. • Considers the mechanism should be targeted, output-based and subject to clear governance, reporting and ex-post review, and should not become a broad re-opener or a way to remove normal business risk from Western Power. • Recommends Western Power identify any proposed candidate programs in its AA6 proposal and explain why the mechanism is needed, and the outputs, costs, benefits and customer outcomes that would be delivered.
Section 6.2.3.	**WA Expert Consumer Panel** • Notes that, while the draft decision stops short of implementing a full Total Expenditure framework, the proposed combined investment and operating expenditure adjustment mechanism reflects Totex principles. • Commends the mechanism as a structural step toward contemporary incentive-based network regulation because it would allow capital and operating solutions, including flexible demand orchestration, community batteries and Stand-Alone Power Systems, to be assessed on a more equal economic footing. • Considers this could help maximise the capacity of the existing network, reduce unnecessary asset duplication and minimise long-term transformation costs for energy consumers.

Section of final decision – explanatory statement	Stakeholder submission
Service standard adjustment mechanism	
Sections 5.2.1 and 6.2.4.	**Western Power** Concerned that the ERA may have been proposing to use a rolling average in the service standard adjustment mechanism, which it considered would dilute incentives.
Demand management innovation allowance	
Section 6.2.5.	**Western Power** • Acknowledges the ERA's draft decision that no changes are needed to the current DMIA mechanism. • States that, in the coming months, Western Power planning may identify the need for additional allowances. • Notes the ECP's encouragement for the ERA to expand the use of mechanisms like the innovation allowance. • Considers such a broadening could be within the existing DMIA mechanism, or through a new innovation fund (for example, a totex allowance on a use-it-or-lose-it basis) which could cover defined categories of work and/or projects. Western Power notes that Ofgem provides a broader 'Network Innovation Allowance' to the Electricity Transmission, Gas Transmission and Gas Distribution networks under its RIIO-3 price control.
Section 6.2.5.	**WA Expert Consumer Panel** • Encourages the ERA to expand the use of mechanisms such as the innovation allowance. • Considers a mechanism is also needed to allow Western Power, with the agreement of the Minister, to respond quickly to new federal funding opportunities that may arise at short notice during AA6.
Sections 6.2.3 and 6.2.5.	**Synergy** • Supports the ERA considering how existing mechanisms, including the investment adjustment mechanism, D-factor and demand management innovation allowance, could be used to support efficient delivery of actions identified in the strategies Western Power is required to prepare for AA6. • Considers this would reduce the risk that Western Power identifies prudent and efficient actions in its strategies but later cites funding uncertainty or budgetary constraints as a reason those actions are not delivered. • Considers any use of these mechanisms should remain linked to clear actions, outputs, costs, benefits and customer outcomes.

Section of final decision – explanatory statement	Stakeholder submission
Mid-period revisions	
Section 6.2.6.	**Western Power** Continues to consider that additional guidance and clarity is required around the processes for lodging and assessing mid-period revisions. In relation to section 4.37 of the Access Code which deals with "trigger events" it notes: • The current access arrangement contains a single trigger event which it considers: – Only includes significant unforeseen events and does not include events that are foreseeable but which are uncertain in their likelihood or timing. – Is generic in nature which results in it not being capable of objective assessment through a pre-defined test, resulting in a lack of regulatory certainty. – Doesn't agree that the Code requires a full reopening of the access arrangement. – Would be improved by: – Including several defined trigger events in the access arrangement in addition to the generic trigger event and considers this would lessen the need for the ERA to apply regulatory discretion regarding the occurrence of an event. In relation to the mid-period revisions under section 4.41A it considers: • The process by which Western Power would apply for, and the ERA would assess, such proposed revisions are described in the Access Code only at a very high level. The ERA must simply determine whether advantages of varying the access arrangement outweigh the disadvantages, in particular the disadvantages associated with decreased regulatory certainty and increased regulatory cost and delay. • Additional guidance and clarity is required to promote regulatory certainty which would benefit both Western Power and customers. Considers that, given the ERA's draft decision, and the differing understandings of the operation of the section 4.37 mechanism, suggests that this matter might be addressed through a future review of the Access Code in order to clarify the operation of the mechanisms available for the making of mid-period revisions.
Sections 6.2.3 and 6.2.6.	**Australian Energy Council** The absence of a link between government policies, planning initiatives, and the Access Arrangement creates a genuine risk that major policy shifts, new government directives or significant changes in forecasts will have a material impact

Section of final decision – explanatory statement	Stakeholder submission
	during the AA6 period and lead to mid-period cost escalations. These scenarios are particularly challenging for AEC members to plan for. In this context, the AEC considers that Western Power should be required to explain: • How uncertainty will be addressed during AA6; • What formal adjustment mechanisms it proposes; and • What circumstances or scenarios would trigger a formal adjustment mechanism and mid-period revision. The AEC suggests that, where possible, uncertainty should be managed through transparent engagement and staged approvals, rather than by immediately transferring avoidable risk to customers via tariffs and creating unnecessary tariff volatility for network users.
Section 6.2.6.	**Synergy** • Supports the ERA retaining flexibility in the current uncertainty framework, including the existing architecture of adjustment mechanisms, mid-period revisions and trigger events. Synergy did not seek additional prescriptive triggers for mid-period revisions in its response to the ERA's F&A issues paper. • But recommends the final decision on the F&A set out the principles the ERA expects to apply when considering mid-period revision proposals or targeted adjustment mechanisms during AA6. Those principles could include materiality, evidence requirements, the link between costs and outputs, the extent to which the event or cost is within Western Power's control, customer impacts, consultation expectations, and how the proposal preserves incentives for efficient delivery. • Considers this would not reduce the ERA's discretion. Rather, it would provide greater transparency for Western Power, network users and customers about how uncertainty will be managed during AA6.

Table 6: Streetlighting

Section of final decision – explanatory statement	Stakeholder submission
Section 7.2.	**Western Power** • Does not support the ERA's proposed approach with regard to its public lighting strategy and considers that Western Power is best placed to manage consultation on this strategy and its timing.

Section of final decision – explanatory statement	Stakeholder submission
	• Considers that public lighting planning forms part of the broader network planning portfolio and is subject to prioritisation, including resourcing and funding constraints. As a result, public lighting activities evolve over time in response to changing network and competing priorities. Managing consultation directly allows Western Power to engage with stakeholders in a timely and integrated manner, consistent with how decisions are made and implemented in practice. Notes its current consultation for streetlighting strategy is expected to resume in the coming months, following completion of current prioritisation activities. • Acknowledges the ERA's intent to explore mechanisms that may improve service outcomes, including enabling customers to engage third parties to undertake streetlighting repairs. However, Western Power does not support the introduction of such processes, as they would be inconsistent with its safety, regulatory, and asset accountability obligations. • Acknowledges customers' frustration from the varied and often long wait time for repair of cable faults. We are also aware of concerns that the current service standards do not capture key elements of customer experience and may not provide the levels of transparency customers, or the ERA, expect. However, we do not support the introduction of a new SSB for streetlighting cable faults or the inclusion of the impact of cable faults in the existing streetlight SSB. Streetlight cable fault repair times are too heavily reliant on external factors such as: – Local Government permitting requirements – Main Roads Western Australia approvals for closure of road corridors – availability of specialist cable locating resources – traffic management requirements – other site access constraints and considerations. • Considers its accountability to customers can be demonstrated through proportionate improvement in transparency of its performance. Western Power supports providing greater transparency about the number of cable faults and the duration of these faults, once resolved, and based on available information. • Notes that there is inherent difficulty in determining the number of lights impacted by each fault. Western Power relies on members of the public and Local Governments to report streetlight faults (i.e. lights not operating) via its online portal or Customer Service Centre. If Western Power were required to report accurately on repair times for streetlight cable faults, this would require investment in systems and processes to capture this data accurately. Considering customer concerns surrounding affordability we are concerned that the benefits of improved data on the number of lights impacted would not outweigh the costs. We acknowledge that customers may use information on the number of lights impacted by cable faults when assessing the variable charge on their bills. Our assessment of the available data indicates that the number of affected streetlights due to cable faults is small, and this corresponds to a modest impact on the variable portion of network charges.

Section of final decision – explanatory statement	Stakeholder submission
	• Western Power supports proportionate improvement in transparency on these faults and has been investigating ways of providing repair times and volumes by LGA for streetlight cable faults that have been resolved during a year to include this information in annual service standard performance reporting.
Section 7.2.	**Synergy** • Says streetlighting performance remains a concern and supports requiring a Public Lighting Strategy to be submitted with the AA6 proposal. • Considers this timing means the strategy can be tested alongside Western Power's proposed expenditure, tariffs, service standards and delivery commitments that should make it more likely the strategy results in practical change rather than remaining a high-level planning document. • Recommends the Public Lighting Strategy be an operational improvement plan, with clear actions, costs, milestones, service standards, reporting and customer charging arrangements. • Supports resetting streetlighting service standard benchmarks so they better reflect the service customers actually receive, including distinguishing between metropolitan and regional areas and between general, complex and priority streetlight faults. • Recommends Western Power consider customer credits or charge adjustments where relevant streetlighting service standards are not met. • Considers customers should not pay the lighting component of the charge for periods when a streetlight is not operational, and that Western Power should set out how it will identify non-operational lights, calculate charge adjustments and provide the information needed for accurate billing. • Recommends monthly streetlighting information be provided to network users, including faults by local government area, asset identification, outage report and restoration dates, fault type, repair time, asset type and LED replacement progress. • Recommends Western Power engage directly with Synergy, WALGA and local government authorities in developing and updating the strategy, including on service issues, information needs, options to improve performance, and the cost and timing of those options.

Table 7: Connecting customers

Section of final decision – explanatory statement	Stakeholder submission
Section 8.2.	**Western Power** • Recognises the importance of improving timeframes for connecting to its network. • Is progressing improvements to connections as part of ongoing initiatives and will continue to engage with the ERA on how these improvements can be appropriately reflected in the AA6 framework. • Considers that any strategy or reporting expectations should be proportionate and reflect the evolving nature of underlying processes and capabilities.
Section 8.2.	**Alinta** Recognises Western Power's work in improving its connection process and timeframes amid a challenging and increasing workload but supports a Connections Improvement Strategy and ongoing reporting and considers it will help maintain focus and accountability on managing connection timeframes as demand for new connections continues to increase.
Section 8.2.	**Australian Energy Council** • Recognises the work Western Power has undertaken to improve connection communication and processes, including self-service options, process streamlining and the Major Customer Portal, but remains concerned that connection timeframes are still lengthy and may delay investment in new generation and the energy transition. • Considers reliance on "reasonable" and "best endeavours" obligations is insufficient and recommends Western Power be required to deliver a practical connection strategy that sets clear performance targets for reducing end-to-end connection timeframes, supported by transparent reporting by process stage and customer category. • Considers the strategy should identify what is slowing the connection process, what resources or actions are needed, when these will be implemented and how connection performance will improve, particularly for generation, large load, industrial and mining connections. • Notes concerns that the critical project framework has created unintended consequences, including cases where similar projects have received different connection outcomes without a clear pathway to challenge the result. • Considers stronger accountability should be embedded so Western Power's obligations are sufficiently clear to drive operational reform during AA6.
Section 8.2.	**Synergy** • Supports the ERA requiring Western Power to prepare a Connections Improvement Strategy.

Section of final decision – explanatory statement	Stakeholder submission
	• Considers timely connection of new generation, storage and load is essential to Western Australia's energy transition, particularly as renewable generation, storage and electrification of major loads increase. • Acknowledges Western Power has improved its connection processes during AA5, but considers connection timeframes remain a material issue for Synergy, customers and proponents seeking access to the network. • Supports the ERA's draft decision not to impose a connections service standard adjustment mechanism at this stage. Synergy considers a service standard may help measure performance, but would not necessarily address the issue if the main constraint is delivery capacity. • Considers the main constraint is likely to be Western Power's resourcing and capability rather than process design. The strategy should therefore identify current performance, queues, key bottlenecks, binding delivery constraints and the actions needed to improve connection timeframes and customer experience. • Recommends the strategy cover major customer connections, generation, storage, DER and large load connections; identify additional resources, systems, third-party support or self-service options; set out expected improvements; and explain how progress and stakeholder feedback will be reported during AA6. • Supports Western Power considering greater use of qualified third-party support and greater self-service options where these would reduce bottlenecks without compromising safety, system security or quality.
Section 8.2.	**Zenith** • Supports the proposal for a connections improvement strategy but emphasises the need for the strategy to include clear and enforceable performance targets for connection timeframes, particularly for complex projects. • The current connections process can result in protracted timelines and excessive administrative burdens, which disproportionately affect licenced network operators. • Zenith's projects involve complex technical and operational requirements that require a higher level of responsiveness and expertise from Western Power. Considers the connection process would benefit from restructuring that better accommodates the needs of sophisticated network operators including through priority processing, cost transparency, streamlined processes for complex connections and enhanced stakeholder engagement.
Section 8.2. Use of independent evaluations and market participant performance surveys will be considered	**WA Expert Consumer Panel** • Supports the ERA requiring Western Power to prepare a comprehensive Connections Improvement Strategy as part of the AA6 proposal. • Considers connection performance should be treated as an essential service issue, noting that prolonged connection timelines can delay housing, commercial projects, economic development and the energy transition.

Section of final decision – explanatory statement	Stakeholder submission
during the AA review and post review monitoring of progress. Process not mature enough yet for incentive payments. Consider for future but would likely need policy changes.	• Notes stakeholder evidence of lengthy connection timelines and considers the increase in requested connection capacity indicates that connection performance is likely to remain an ongoing challenge rather than a temporary resourcing issue. • Considers the strategy should provide a high degree of assurance about how any current or foreseeable resourcing constraints will be addressed. • Notes the ERA is asking Western Power to define its own metrics, baseline assumptions and tracking mechanisms. The ECP accepts this reflects the practical difficulty of regulating new issues without mature performance data, but considers the ERA will need to guard against insufficiently ambitious benchmarks. • Recommends the ERA introduce an independent qualitative performance incentive framework, informed by approaches used in other jurisdictions, under which rewards and penalties could be linked to targeted customer journey surveys and independent evaluations. • Recommends establishing a small independent expert panel to provide annual qualitative evaluation of Western Power's DSO and connections performance, with published reporting to support transparency and accountability. • Recommends targeted annual market participant surveys of active commercial grid participants, such as VPP aggregators, charge point operators, battery developers and large industrial loads, to assess operational friction points including data access, connection timeframes and transparency of dynamic curtailment principles. • Considers that combining objective metrics with independent qualitative review and market feedback would strengthen data transparency and provide assurance that non-wires options are being genuinely considered and optimised.
Noted.	**VisNet** Considers the challenges Western Power has with low voltage connection processes could be overcome by using software that is already in use in the UK. It provides an online self service system for customers to get quotes in minutes rather than the current manual process that takes months.
Section 8.2.	**Electrify Everything WA** Supported improvement to connection processes and greater transparency for emerging customer technologies and connection arrangements.

Table 8: Contributions policy

Section of final decision – explanatory statement	Stakeholder submission
Section 9.2.	**Western Power** States it is undertaking a review of its contributions policy in preparation for submission in its proposed access arrangement in February 2027. Notes this will reflect any changes made to the current distribution low voltage connection scheme as well as the potential amendments to the Electricity Industry Act 2004, which introduce a new fixed capital charge for transmission-connected customers (over 10 megawatts).
Section 9.2.	**Alinta** Supports clearer definition of shared assets and improved cost allocation to avoid first-mover disadvantage and inefficient investment signals. Considers that under the current approach: • Connection costs are heavily influenced by discretion given the broad definition of shared and connection assets in the Access Code which creates ambiguity as to which investments are considered to benefit multiple users. Considers that, without greater clarity, this uncertainty is likely to persist, despite the planned Fixed Capital Charge reforms with potential impacts on project economics, financing confidence and investment timing. • May not support efficient network investment outcomes because, while it can be efficient to oversize assets where future users are expected to benefit, the current framework can result in: – the initial connecting proponent bearing the full upfront cost and – uncertain, delayed or unclear reimbursement when subsequent users connect which creates inefficient investment signals and exposes proponents to a first-mover disadvantage which may deter otherwise efficient development. Recommends defining shared assets as “All network investment that provides, or could reasonably provide, benefits beyond the connecting applicant, including any augmentation or reinforcement that enhances network capacity, capability, reliability or access for current or future users.” Considers this revised definition would address the issues identified above by more clearly delineating shared network investment from applicant-specific works and in practice would support an approach where: • The network funds augmentations that provide broader system benefits. • Costs are recovered over time from future beneficiaries, rather than being disproportionately allocated to the initial proponent. Considers this would better align cost allocation with those who benefit and support the least-cost development of the network over the long term.

Section of final decision – explanatory statement	Stakeholder submission
Section 9.2.	**Australian Energy Council** Similar to the views expressed in the Alinta submission. Considers the lack of clarity about what are shared or project assets potentially slows the development process, impacts project viability and makes it difficult for proponents to proceed with confidence. Considers Western Power should be encouraged to create and use a tighter definition of shared assets and identify better ways to assess and allocate shared network costs. Considers a tighter definition of shared assets will: • Reduce ambiguity • Avoid a first mover disadvantage for proponents where the initial customer bears the full upfront cost; • Provide more transparency around reimbursement when additional customers connect; • Promote more efficient investment.
Section 9.2.	**Synergy** Supports improved transparency and accountability in the contributions policy, including clearly identifying who bears connection and augmentation costs. Costs should not be shifted inequitably onto the broader customer base where they are more appropriately borne by the connecting customer or another identifiable beneficiary. Recommends final decision: • Require Western Power to address the ERA's expectations directly in its AA6 proposal, including by explaining the options considered, the proposed approach, the expected customer impacts and how the policy remains consistent with the ENAC objective and the SEO. • Provide guidance on how the ERA expects any interaction of the contributions policy and any State Government decision on a Fixed Capital Charge will be managed during AA6, so that any future changes can be assessed transparently and without creating inefficient or inequitable cost recovery outcomes.

Table 9: Distributed energy resources integration and transition to distribution system operator

Section of final decision – explanatory statement	Stakeholder submission
Section 10.2.	**Western Power** • Notes it has existing internal strategies that will be developed for sharing with its stakeholders. • Is in the process of developing the internal processes to operate as an effective DSO, with elements of its strategy to be shared with stakeholders over time where appropriate. Is supportive of the ERA proposals but notes the following considerations should be made in relation to the contents of the strategies: – Robust DER forecasting remains dependent on access to behind-the-meter telemetry and customer DER data. Current regulatory and data-sharing arrangements may limit forecast granularity and accuracy. – With regard to network visibility and data enablement, full hosting capacity publication and broad customer/third-party operational data access are not currently mature DSO capabilities and may require further policy, governance and regulatory development. – On connections and approvals reform, Western Power understands that there may be an expectation for measurable performance reporting and transparency metrics to mature during AA6. Western Power welcomes further engagement regarding any additional reporting requirements and transparency metrics. Some metrics and baselines are still evolving as capabilities transition from minimum viable products to scalable operational deployment during AA6. – Implementing dynamic operating and connection arrangements will depend on maturing customer-facing governance frameworks, establishing transparent curtailment principles, and developing robust customer education pathways. – Governance arrangements, market interfaces and cost allocation frameworks underpinning the DSO and market facilitation roles are still evolving and should not be assumed to be fully established during AA6. • Considers with regard to the long-term DSO transition pathway, it will be important to clearly distinguish between capabilities already operational, capabilities scaling during AA6 and longer-term end-state aspirations beyond AA6.
Section 10.2.	**Synergy** • Supports the ERA requiring Western Power to prepare a DER integration and DSO transition strategy as part of the AA6 proposal. • Considers DER will be central to improving network utilisation, managing constraints, deferring or avoiding network investment and supporting customer choice during the energy transition. • Considers the strategy should not simply describe Western Power's future DSO role, but should set out what Western Power will do during AA6, what it will cost, what benefits are expected and how performance will be measured.

Section of final decision – explanatory statement	Stakeholder submission
	• Recommends the strategy clearly distinguish between the role of DER in the wholesale market and the role of DER in providing network services, including how the two roles will interact without duplication or double recovery. • Considers network users need better information about where the network needs support, what problem Western Power is seeking to solve, what service is required and what that service is worth. • Recommends the strategy explain how Western Power will identify and value DER and other non-network services, including the methodology for calculating network benefits and how those benefits will be shared with network users and DER owners. • Considers Western Power should assess whether existing generation, storage, demand response and customer-facing DER capability can defer or avoid network augmentation before committing to new network expenditure. • Supports the strategy addressing dynamic operating envelopes, dynamic connection arrangements, network visibility and data enablement, including customer impacts, curtailment arrangements and information available to network users and authorised third parties. • Recommends clear cost attribution between regulated network services and market-facing functions, including the relevant DSO functions, cost drivers, recovery pathways and controls to prevent double recovery.
Section 10.2.	**Zenith** Supports requiring Western Power to provide a clear strategy for DER integration and transitioning to a DSO model. Considers the strategy should expressly recognise the role of microgrids as flexibility providers and customer facing system operators.
Section 10.2. Use of independent evaluations and market participant performance surveys will be considered during the AA review and post review monitoring of progress. Process not mature enough yet for incentive payments. Consider for future but would likely need policy changes.	**WA Expert Consumer Panel** • Supports the required DSO transition strategy but considers it needs to be supported by financial incentives or mechanisms that would materially influence behaviour or overcome capital bias. • Considers successful demand management and non-wires programs are typically led by a clear “lead agency”, noting the battery rebate program is led by EPWA with support from other parties. • In contrast, considers Western Power’s current approach is to define the need through the Network Support Service and then seek market responses through EOIs and tenders, with no single agency responsible for designing the program end-to-end or ensuring the elements for successful delivery are in place. • Considers the DSO transition strategy creates an opportunity for Western Power to take a more active leadership role in designing non-wires programs, supporting providers to deliver viable solutions, and ensuring those solutions can compete with traditional network investment on cost and performance.

Section of final decision – explanatory statement	Stakeholder submission
	• Notes that delivering this shift will require a step change in capability and resourcing, similar to dedicated demand management teams in other jurisdictions. • Notes the ERA is asking Western Power to define its own metrics, baseline assumptions and tracking mechanisms for emerging DSO-related functions. The ECP considers this may be necessary at this stage but creates a risk that benchmarks are insufficiently ambitious. • Recommends the DSO transition strategy be supported by an independent expert panel and annual market survey to assess how effectively Western Power is enabling third-party non-wires solutions.
Section 10.2.	**Alinta** Supports clear justification of new DSO-related expenditure and functions and a staged, disciplined approach to implementation.
Section 10.2 The technologies identified in the submission are at varying stages of maturity. Many involve technical, safety, building, and consumer protection considerations that fall outside the scope of the access arrangement review and Western Power is not the lead agency for dealing with them. Broader questions regarding residential electrical standards and building requirements extend beyond the scope of this framework and approach.	**Electrify Everything WA** Supported greater participation by customer-owned DER and submitted that Western Power should develop pathways for emerging technologies and operating models, including vehicle-to-grid services, plug-in batteries, balcony solar systems and solar-sharing arrangements for strata developments. It submitted that clear technical requirements, connection arrangements and assessment processes would assist customer participation and innovation. Submitted that future residential electrification may increase the value of higher-capacity residential connection (e.g. make three phase connections mandatory for new properties) and wiring arrangements (e.g. require wiring larger switch boards in new properties to accommodate EV chargers and other DER equipment).

Table 10: Electric vehicles

Section of final decision – explanatory statement	Stakeholder submission
Section 11.2.	**Western Power** States it has existing internal strategies and will continue to refine and share relevant elements with stakeholders as the market evolves. Considers its existing EV strategy is robust and covers use cases identified by the ERA. It is supportive of the ERA proposals but notes that the following considerations should be made in relation to the contents of the strategy: • Use cases and pace of EV uptake is evolving. • EV demand forecast accuracy remains dependent on evolving EV uptake visibility and charging behaviour data (which does not come from one single source). • For long-term EV readiness and electrification planning, demand impacts may materially increase, if off-peak charging incentives and flexibility measures are not realised or sufficient to change behaviour. • Network and retail tariffs are de-linked, and Western Power does not directly control assignment of network tariffs to connections or customer retail price incentives. Customer responses to network tariff signals remain uncertain and depend heavily on retailer offerings and customer behaviour. • Any tariff reform must balance efficiency, customer impacts, equity considerations and practical implementation complexity. • Large charging loads may still require significant traditional network investment depending on location and utilisation patterns or duty cycles. • Vehicle-to-grid capability remains early-stage and dependent on standards, technology maturity, market design and customer participation. • Visibility of EV charging behaviour and flexible charging response remains immature and dependent on evolving telemetry and interoperability pathways. • With regard to non-network solutions and managed charging, flexibility should not be assumed to avoid all traditional augmentation. Enduring safety, capacity and reliability obligations may still require physical network investment. • With regard to reporting, transparency and review triggers, appropriate metrics and reporting frameworks will continue maturing alongside EV uptake and DSO capability development. • The State Government has a State Electric Vehicle Strategy for Western Australia. Western Power's EV strategy will support the State Government's strategy and be aligned with those matters related to the Western Power-owned network.

Section of final decision – explanatory statement	Stakeholder submission
Section 11.2.	**Synergy** • Supports the ERA requiring Western Power to prepare an EV strategy as part of its AA6 proposal. • Considers EV uptake will materially affect network utilisation, peak demand, customer costs and retail product design. If managed well, EV charging can improve network utilisation and support the energy transition; if managed poorly, it could increase peak demand and network costs. • Considers the EV strategy should be practical and lead to clear AA6 actions, including any required changes to reference services, tariffs, connection processes and service settings. • Recommends the strategy explain how Western Power will support efficient charging behaviour, including shifting load away from peak periods where appropriate, while avoiding unnecessary barriers to EV uptake or public charging infrastructure. • Notes that existing EV reference services have not worked as intended from Synergy's perspective. Considers EV services and tariffs should be developed with network users and retailers so they are operable, equitable and capable of being reflected in customer offerings.
Section 11.2.	**WA Expert Consumer Panel** • Supports the ERA requiring Western Power to prepare an EV strategy and considers Western Power must plan for rapid growth in EV uptake through to 2032. • Considers Western Power should move beyond conservative EV baselines, noting the ECP's view that the cost of underinvestment in this area may exceed the cost of prudent overinvestment. • Considers insufficient EV charging infrastructure may now be slowing EV uptake in Western Australia, with adverse implications for energy security, emissions and economic outcomes. • Recommends the Government, advised by EPWA, Western Power and the ERA, clarify the role Western Power should play in supporting charging infrastructure during AA6. • Considers that, at a minimum, Western Power should provide a streamlined, user-friendly and reasonably priced connection service for EV charging infrastructure providers. • Supports sharpening network pricing to provide clear financial incentives for EV owners to charge outside system peaks, including to absorb daytime solar and reduce grid congestion. • Supports coordinated and clear connection pathways for fleet depots and public fast-charging sites, and recommends drawing from National Electricity Market practice to standardise and accelerate connection timeframes for charge point operators.

Section of final decision – explanatory statement	Stakeholder submission
	• Recommends Western Power prioritise public kerbside charging infrastructure to improve EV access for renters and high-density residents. • Considers Western Power's EV strategy should facilitate bidirectional vehicle-to-everything capability so parked vehicles can provide energy flexibility as the technology and market arrangements mature.
Section 11.2.	**Electrify Everything WA** Considers Western Power should facilitate emerging charging models, including vehicle-to-grid services and charging arrangements for households without access to off-street parking. It submitted that customers would benefit from greater clarity regarding technical requirements, connection arrangements and approval processes for bidirectional charging and other innovative charging solutions.

Table 11: Local area reports

Section of final decision – explanatory statement	Stakeholder submission
Section 12.2.	**Western Power** • Does not support this proposal. States local area boundaries are not units used to plan, operate or invest in the network and therefore, do not provide a meaningful basis for presenting access arrangement plans and outcomes. Western Power's investment decisions are guided by a risk-based and adaptive planning framework that prioritises asset condition, network risk, customer impacts, and system need, rather than administrative boundaries. • Considers the ERA's proposal creates the following risks and issues: – Misalignment with network planning processes. – Risk of creating false precision and misleading stakeholders. – Reduced flexibility to respond to risk. – Reduced flexibility to deliver on Government priorities. – Significant administrative and regulatory burden. – A reduction in incentives to innovate.

Section of final decision – explanatory statement	Stakeholder submission
	• Considers that "by pre-defining our investment planning, the local area plans reduce Western Power's incentive to apply innovative solutions that were not already recognised at time of publication. … Western Power dynamically plans and re-prioritises its investments when new information or opportunities arise. In addition, the emergence of VPPs and increasing sophistication of our customers to provide demand response (and potentially other services) may be left unrecognised or underinvested in. • Considers it is the "market maker for network solutions" in the South West Interconnected System and that it is important that it can remain flexible and respond dynamically as new players and opportunities enter the market. Considers establishing clear signals for these services is critical to facilitation and expansion of this market into the future and is a core part of its developing role as DSO. • States it supports the intent of the ERA's objective of improving transparency and visibility of outcomes for customers, but considers this objective is better achieved through approaches that reflect how the network is managed in practice. Notes the following as information currently made available and/or shared: – Regional connect website and service standard performance report (which includes reliability metrics for LGAs). – Transmission System Plan. – Network Opportunities Map. – Regional Reliability Plan which will be published as part of our AA6 submission. – Western Power will consult with stakeholders in developing the plan. – WoSP (developed in partnership with Government) which will be published by 30 September 2027. • Proposes the following: – Strengthened regional engagement and insight to support understanding of local priorities, network constraints and customer outcomes. – Vision and strategy for improving connection process, integrating DER, its role as DSO, integrating EVs and public lighting. – Improved customer service standard benchmarks. – Working with customers to address issues they raised in response to the determination of AA6 framework and approach. These include issues raised in relation to improving connection process, transparency of charges, cable faults affecting street lights per local area, and application of distributed low voltage connection scheme to regions.

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	• States it has enhanced its approach to stakeholder engagement through a geographically aligned model, which will commence in July 2026, that it considers will support an integrated understanding of regional priorities, network challenges, growth pressures, customer needs and emerging issues to improve coordination and engagement.
Section 12.2.	**Synergy** • Supports the ERA's proposal for Western Power to prepare local area plans. • Considers local area plans would provide network users, customers and local governments with clearer information about local constraints, forecast growth, planned works, emerging opportunities and likely timing of network changes. • Considers stakeholders experience the network in particular places, rather than as a single system-wide average, and that local area plans would help explain what Western Power's AA6 proposal means in practical terms for different parts of the network. • Agrees local area plans should be proportionate and should not create unnecessary administrative burden, but considers much of the relevant information should already exist within Western Power's planning, asset management, connection, customer engagement and regulatory reporting processes. • Recommends the plans include practical decision-making information, including material local constraints and congestion, forecast growth, relevant DER, EV and electrification drivers, major planned augmentation or asset replacement works, planned or potential non-network responses, indicative timing and key dependencies, local reliability or service performance information, links to related strategies, and a pathway for stakeholder engagement as local priorities change. • Supports local area plans being used for transparency and accountability rather than to create binding local targets that unduly constrain Western Power's ability to manage the network. • Notes that limits on geographically differentiated tariffs should not prevent Western Power from providing better geographic visibility of network conditions, constraints, investment priorities and customer outcomes.
Section 12.2.	**WA Expert Consumer Panel** • Strongly supports the ERA's recommended framework for local area planning, noting the ECP's view that the energy transition is inherently spatial and cannot be managed through one-size-fits-all approaches. • Considers local area planning would improve visibility of low-voltage network conditions and help local governments, developers and service providers align community batteries, local demand management and other solutions with actual system constraints.

Section of final decision – explanatory statement	Stakeholder submission
	• Considers place-based planning is important for addressing uneven exposure to climate risks and ensuring that network planning reflects differences in socioeconomic and geographic conditions, including impacts on low-income and remote communities. • Does not accept Western Power's concern that formalising local planning would unduly restrict operational flexibility. The ECP considers local engagement can help anticipate and mitigate grid risks, and that flexibility is better managed through clearer uncertainty mechanisms rather than abandoning spatial transparency. • Highlights the potential impact of data centres on electricity demand, network use, land use and planning frameworks, and considers local area planning would provide a framework for Western Power to engage with large new loads in a proactive and locally sensitive way. • Considers that, if data centres are well located from a network perspective and given appropriate incentives to use DER, they could provide a source of flexibility as well as additional load.