



23 April 2024

Regulating the provision of on-site power supply services

Thank you for the opportunity to comment on the Consultation Regulatory Impact Statement (CRIS) relating to regulating the provision of on-site power supply services.

The Property Council of Australia

The Property Council of Australia is the peak industry body representing the whole of the property industry. In Australia, the Property industry employs more than 1.4 million Australians and shapes the future of our communities and cities.

This submission is informed by Property Council's membership and expert committee members.

AES registration framework with tailored code obligations

Ongoing investment in on-site power supply (OPS) services from property owners will require a regulatory approach that balances consumer protection against a risk of overregulation.

The Property Council WA believes that Option 3 set out within the CRIS provides the best balance of regulation and benefit to customers.

By requiring OPS service providers to register under the Economic Regulation Authority (ERA), become a member of the Electricity Ombudsman scheme, and meet relevant obligations under the AES Code, adequate protections will be established for the OPS customer.

Clarity on OPS consumers

The Property Council notes that OPS arrangements (OPSAs) are most often established between a property owner and a third-party business that installs and owns the system. In some circumstances, the end-consumer of the energy produced by the OPS will not be the party that has entered into the OPSA (e.g. a tenant of a landlord with an OPS service installed on their property).

In circumstances such as this, the tenant often has a secondary arrangement with the landlord to access the electricity produced by the OPS service. The Property Council believes that further consideration needs to be given as to how these arrangements will work, given they will fall out of the scope of the proposed regulatory requirements.

Next Steps

If you require further information or clarification, please contact Lindsay Duncan, WA Policy Advisor at

[REDACTED] or [REDACTED]

Yours sincerely,

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Emily Young

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Property Council of Australia