

Consultation on AES general regulations

Consultation paper submission form

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Send your feedback to EPWA-AES@dmirs.wa.gov.au or to Energy Policy WA, Locked Bag 11, Cloisters Square, WA 6850 by 5pm (AWST), Friday 19 April.

We will publish your submission on Energy Policy WA website, unless you ask that we keep it confidential. Please give reasons why your submission should not be published.

Question number	Section reference in Consultation Paper	Questions for consultation	Your comments
1.	<p>Section 2.1.3. Consulting on granting, renewing, amending, or transferring registration applications - regulatory proposal</p>	<p>Do you support the proposed approach on the consultation requirements of registration applications as described? If not, please explain why.</p>	<p>The Expert Consumer Panel submits that:</p> <ul style="list-style-type: none"> ● 30 days is a reasonable minimum timeframe, however when multiple submissions are posted at once, a longer timeframe may be appropriate. ● Reasonable endeavours should be made to notify people 30 days before the close of submissions. ● We support the abolition of the daily newspaper requirement and substitution with online consultation. ● Moving to a primarily online consultation method increases opportunities for consultation for people who require accessibility amendments to websites, and people who speak English as a second language. Web presence and development should include considerations of serving these demographics. ● Moving to a primarily online consultation may exclude groups which have limited web skills and poor internet connection. Further consideration of these groups is recommended. ● If practicable, inform consumers under existing arrangements that are being considered for renewal, amendment or transfer of registration.

Question number	Section reference in Consultation Paper	Questions for consultation	Your comments
			<ul style="list-style-type: none"> ● Offer at least one alternate form of feedback other than written submission.
2.	Section 2.2.3. Consulting on the AES Code - regulatory proposal	Do you support the proposed approach to the regulation of public consultation processes as described? If not, please explain why.	<p>The Expert Consumer Panel supports the proposed approach, noting that consumers would benefit further by:</p> <ul style="list-style-type: none"> ● Consultation in a range of formats, including written submissions as well as workshops and surveys. We note that workshops provide a valuable opportunity for diverse groups of interest to interface and identify interdependencies. <p>The proposed approach relies on one-way communication to persons of material interest, without them having the opportunity to contribute to how AES code amendments and reviews are undertaken and identify key issues for consultation.</p> <ul style="list-style-type: none"> ● In the absence of a permanent committee, like The Electricity Code Consultative Committee (ECCC), there should be opportunities beyond consultation. This may take the form of occasional forums or workshops.

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3.		Are there any additional matters related to regulating consultation approaches for AES applications and the AES Code that should be considered by Energy Policy WA?	In regard to engagement in consultation there are opportunities to increase inclusion of emerging businesses who have an interest in the market. The proposed methodology of "identifying persons of interest" (page 17) can inadvertently overlook organisations, companies and individuals (persons) who are not long-established participants in the West Australian market. Particularly because new AES companies might not have reached the registration stage, which would trigger identification as a person of material interest. Concerted efforts will have to be made to find and connect with these individuals for them to be identified as persons of material interest.
4.	Section 3.3. Confidential information - regulatory proposal	Do you support the proposed approach to the regulation of confidential information as described? If not, please explain why.	The Expert Consumer Panel supports the proposed approach.
5.		Are there any additional matters related to regulating the use and disclosure of confidential information that should be considered by Energy Policy WA?	The Expert Consumer Panel does not identify additional matters.