# Consultation on the regulation of On-site Power Supply Arrangements

# Consultation paper submission form

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| Full name |  |
| Organisation and job title |  |
| Postal Address |  |
| Email Address |  |
| Phone Number |  |

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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 Please give reasons why your submission should not be published.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 |
| --- | --- | --- | --- |
|  | Section 4.1. Customer protections suitable for OPSA customers | What types of information should be required to be disclosed to customers in their OPS contract, and what subset of this information should be set out in a clear disclosure statement given to customers before they sign a contract? |  |
|  | The draft obligations provide residential OPSA customers with hardship and/or family violence and some life support protections from their OPS service provider. Noting OPSA customers continue to have a contract with a licensed retailer and access to grid-supplied electricity, are these protections necessary? Why/why not? |  |
|  | Do you have any other comments on the proposed OPSA code obligations? |  |
|  | Section 5.2. Option 2: Licensing  | Is licensing a suitable option to address some of the issues raised in Section 3 – Problem statement, particularly given that it will only cover some OPSA business models? |  |
|  | Are the costs of licensing OPS service providers proportional to the benefits? |  |
|  | What transitional arrangements are appropriate to provide for exempt SPPA providers if licensing is the preferred option for the future regulation of OPS service providers? |  |
|  | Section 5.4. Option 4: AES framework – leverage New Energy Technology Customer Code | Is the AES registration framework a suitable option to address some of the issues raised in Section 3 – Problem statement? *(relevant to Options 3 and 4)* |  |
|  | Are the costs of requiring OPS service provider to register under the AES registration framework proportional to the benefits? *(relevant to Options 3 and 4)* |  |
|  | Do you consider Option 3 (tailored code obligations) or Option 4 (leveraging the NETCC) to be more preferable for applying the AES registration framework to OPS services? Please provide justification for your position. |  |
|  | Section 6. Policy questions under the AES registration framework – Public interest test and public consultation  | Do you support use of the ‘fast track’ route to assess OPS service provider registration applications? Why/why not? |  |
|  | Section 6. Policy questions under the AES registration framework – ERA public register  | What matters should be included on the ERA’s public register about OPS service providers? |  |
|  | Section 6. Policy questions under the AES registration framework – Requirement for retail licensees to register  | Should licensed electricity retailers be permitted to operate as an OPS service provider under authorisation of their licences (with additional licence conditions), or should they be required to also hold an AES registration as an OPS service provider? Please provide justification for your position. |  |
|  | Section 6. Policy questions under the AES registration framework –Transitional arrangements  | What circumstances should be considered for transitional arrangements? |  |
|  | What types of obligations on OPS service providers should be subject to transitional arrangements? |  |
|  | Section 6. Policy questions under the AES registration framework –Interactions between OPSA and embedded networks | Please provide your views on circumstances where OPSA interact with embedded network operations and whether additional regulation is required to ensure consumers are informed about existing contracts with OPS service providers when they buy and/or rent a property. |  |
|  | Section 8. Implementation  | What is the best means of accessing all relevant audiences for OPS service provider educational materials? |  |
|  | What materials and resources would be most suitable to help both OPS service providers and their customers to transition to the AES registration framework? |  |