FLYING MINUTE: Western Power Access Arrangement 6 Framework and Approach

By Max Bushell, Senior Policy Advisor, Road Safety and Infrastructure and Ian Duncan, Executive Manager, Infrastructure

WALGA RECOMMENDATION

That State Council endorse the submission to the Economic Regulation Authority on the Framework and Approach for Western Power Access Arrangement 6.

RESOLUTION 261.FM/2026 **CARRIED**

EXECUTIVE SUMMARY

- Access Arrangements are the main agreement between the Economic Regulation Authority (ERA) and Western Power, which describe how entities obtain access to the Western Power network and set out Western Power's undertakings, including prices, future investments, and current services.
- The current Access Arrangement (AA5) will expire in 2028 and the ERA is seeking feedback on the framework and approach for the next Access Arrangement (AA6).
- This is the first of three opportunities for stakeholder consultation; there will be another consultation period once the draft framework and approach have been released, and another on the draft Access Arrangement 6 (AA6) submitted by Western Power.
- WALGA prepared a discussion paper and sought Local Government feedback. Ten Local Governments provided comment. WALGA synthesized these comments and prepared a submission on the AA6 Framework and Approach.
- Local Governments identified 16+ areas of criticality for consideration and inclusion in the AA6 Framework and Approach.
- The Infrastructure Policy Team considered the draft Discussion Paper and submission at its meeting on 20 January.
- Feedback to the ERA on the AA6 Framework and Approach closes on 6 February.

ATTACHMENT

- WALGA's Submission to the ERA on the Western Power Access Arrangement 6 Framework and Approach
- WALGA's Western Power Access Arrangement 6 Framework and Approach Discussion Paper

POLICY IMPLICATIONS

The Western Power Access Arrangement has broad implications for WALGA's policy positions on street lighting (Policy Position 5.5 and Policy Position 5.5.1), as it is an important influence on how and how much Local Governments are charged for the provision of street lighting. The Access Arrangement may influence the rate at which existing luminaires are replaced with lower cost, energy efficient LED luminaires.

The Access Arrangement will also influence the rate and cost of Underground Power conversion projects (Policy Position 5.7).

BACKGROUND

Local Governments have a unique and multi-dimensional commercial relationship with Western Power. The sector is the primary consumer of streetlighting services, the main source of sustained demand for electricity infrastructure relocations, for road improvement and development projects, and a complex electricity consumer. As such, elements of access arrangements may have significant impacts on how Local Governments consume electricity, program road construction and land development projects, and pay for streetlights, among other Local Government functions.

On 1 December 2025, the Economic Regulation Authority (ERA) released an issues paper seeking feedback from stakeholders on the framework and approach for Western Power's sixth access arrangement review. The ERA is seeking comment on specific issues by 6 February. This is the first of three milestones in the development of a final Access Arrangement 6 (AA6). Following feedback on the framework and approach, the ERA will prepare a draft framework and approach, which will be released for public comment in March/April 2026. Thereafter, Western Power will prepare the draft AA6 for review and consultation in February 2027 with a target date of 1 July 2028 for AA6 to take effect. AA6 will remain in force until 30 June 2032.

Following internal review, the WALGA Infrastructure Team prepared a discussion paper, which was sent to each Local Government CEO in the South West Interconnected System area with a request for feedback from Local Governments by 27 January.

The submissions from Local Government stakeholders identified several critical issues for the Local Government sector, which have been synthesized and consolidated into a submission.

COMMENT

The ERA Issues Paper identifies seven topics on which they are seeking feedback from stakeholders:

1. Expectations for Western Power's AA6 proposal.
2. Changes to the current list of reference services and tariff structures to support new technologies and energy models.
3. Changes to metering services.
4. Improvements for payments of services that are not included in network tariffs.
5. Perspectives on setting disaggregated service standards for reliability and improving service standards.
6. Improvements to Western Power's connection processes.
7. Changes to the price control and incentives and adjustment mechanisms that would improve accountability, deal with uncertainty, and ensure efficiency.

WALGA's submission, which includes feedback from ten Local Governments, identifies areas of overlap between these topics and critical issues for Local Governments and is organised by these topic headings.

To positively influence the AA6 process and ultimately improve service delivery by Western Power, reduce costs, and improve efficiency, it is essential that WALGA put forward the key issues for Local Governments at this early stage. This will help to ensure that areas of critical importance to the Local Government sector are included in the AA6 framework and approach and receive due and detailed consideration in the AA6 itself.

A list of critical Local Government issues is provided below.

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

By highlighting these topics, WALGA and Local Governments are supporting a comprehensive AA6 that will better serve Western Power customers, including Local Governments.

The Infrastructure Policy Team considered the draft Discussion Paper and submission at its meeting on 20 January.

FLYING MINUTE OUTCOME

Poll created: 29/01/2026 at 14:00
Poll closed: 05/02/2026 at 17:00

Name	Completed Date
Chris Antonio	05/02/2026 10:52
Phillip Blight	04/02/2026 6:42
Laurene Bonza	05/02/2026 16:28
Donelle Buegge	04/02/2026 13:38
Scott Crosby	04/02/2026 12:27
Patrick Hall	01/02/2026 10:11
Cate McCullough	No response.
Lewis Hutton	No response.
Mark Irwin	05/02/2026 15:10
Paul Kelly	04/02/2026 22:34
Terresa Lynes	01/02/2026 19:39
Paige McNeil	04/02/2026 12:22
Chris Mitchell	05/02/2026 15:33
Matthew Niikkula	04/02/2026 15:45
Les Price	04/02/2026 18:12
Helen Sadler	30/01/2026 11:42
Robert Schmidt	No response.
Eman Seif	04/02/2026 8:20
Audra Smith	05/02/2026 15:50
Stephen Strange	04/02/2026 20:47
Liz Sudlow	05/02/2026 16:48
Mike Walmsley	04/02/2026 15:33
Karen Wheatland	04/02/2026 12:45
Barry Winmar	02/02/2026 12:03

The submission was endorsed.

Following State Council feedback, amendments were made to the following sections:

- *Section 4 - Payments for Services Improvements;*
- *Section 8 - Other Critical Issues (Asset Management); and*
- *Section 8 - Other Critical Issues (Pole-top Fires).*

Submission

Economic Regulation Authority

Framework and Approach for Western Power Access Arrangement 6

February 2026

About WALGA

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

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

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

Acknowledgement of Country

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

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Summary

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

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

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

Introduction

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

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

Background

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

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

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

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

Critical Issues

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

1. Expectations for Western Power's AA6 Proposal

Streetlighting

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

1. Before introducing any new streetlighting equipment that is likely to affect lighting performance (e.g. globes and luminaires), it must be independently tested against relevant standards and the results published. This will inform whether and how a new asset can be deployed in consultation with customers. (This applies to the LED screw in globe as well as other luminaires).

2. Consult on and publish its Public Lighting Strategy and ensure it complies with the strategy. The strategy must be published at least annually[1] or more frequently if a significant change is required.

3. Clarification of Western Power's complaint handling responsibilities (seeking to resolve issues with customers referred to Local Governments for lighting performance issues).

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

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

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

[2] Public Lighting Asset Management Strategy June 2024 Accessed 28 January 2026

[3] Western Power Corporate Strategy | 2021-2031

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

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

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

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

Public Lighting Code

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

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

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

Targeted Underground Power Program

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

[4] New South Wales Public Lighting Code, July 2024 Accessed 12 January 2026

[5] Urban Greening Strategy Whadjuk (Perth) and Bindjareb (Peel) 2026

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

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

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

2. Changes to Reference Services/Tariff Structures

Move or Remove Electricity Distribution or Transmission Equipment

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

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

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

Reliability

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

EV Charging Stations

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

LED Replacement Service

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

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

Vegetation Management

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

3. Metering Services Changes

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

4. Payments for Services Improvements

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

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

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

5. Disaggregated Service Standards/Improvement to Service Standards

Reliability

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

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

Standalone Power Storage Facilities

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

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

Wait Times

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

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

6. Changes to Price Controls

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

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

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

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

7. Management of Uncertainty

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

8. Other Critical Issues

Asset Management

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

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

Pole-top Fires

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

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

Western Power Project Portal

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

Local Government as Special Customer Recognition

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

Conclusion

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

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

Discussion Paper

Western Power Access Arrangement 6 Framework and Approach

13 January 2026

Background

Western Power

Western Power (WP) is a corporation owned by the Western Australian State Government with primary responsibility for building, maintaining, and operating the electricity network. The WP network serves the southwest corner of Western Australia. With the inclusion of the electricity generators, this network is known as the South West Interconnected System (SWIS) and services part or all of 112 Local Government areas.

Figure 1: WP Network Coverage (Source: WP Website "Our Network Coverage")

WP's direct customers are electricity generators, such as Alinta and Collgar Renewables, and electricity retailers, such as Synergy and Perth Energy/AGL. Local Governments have a unique, multifaceted relationship with WP as:

- the primary user of streetlighting services,
- source of regular demand to relocate or upgrade electricity distribution infrastructure (including placing infrastructure underground) to facilitate road or place improvements and land development, and
- a complex electricity consumer seeking to optimise behind the meter electricity generation and manage consumption.

WP is required to prepare an access arrangement every five years that sets out its undertakings and applies to parties seeking to use the network. The *Electricity Networks Access Code 2004* provides the framework for preparing, approving and reviewing the access arrangement.

Western Power's current access arrangement covers a five-year period from 2022 to 2027 and work has commenced on a new arrangement (Access Arrangement 6 (AA6)).

The focus of this paper is to identify issues that the Local Government sector seeks be regulated or better regulated through this new access arrangement.

Economic Regulation Authority

The Economic Regulation Authority (ERA) was established by the State Government to protect consumers and promote fair, efficient markets in essential services including water, electricity, gas

and rail where competition is limited. It does this by setting rules, monitoring performance, regulating prices and ensuring quality.

The Economic Regulation Authority plays a critical role in its oversight of WP by approving the terms and conditions, including prices, for on-charging for the use of its infrastructure through the Access Arrangements.

Access Arrangement 6 (AA6)

The next Access Arrangement (AA6) proposal will be provided to the ERA by WP in February 2027 and will govern the period of 2027 – 2032. In advance of this deadline, the ERA is undertaking a review of the framework and approach and has released an issues paper highlighting critical areas in need of further consultation. The framework will determine the services that will be regulated through the access arrangement and the broad nature of regulatory arrangements for the AA6 period. There may be other areas that are of particular significance to Local Governments that are not included in the proposed framework.

Local Government Consultation Aim

From previous engagement with Local Governments, WALGA has highlighted critical issues facing Local Governments that need to be included in the scope of AA6. Please review these issues, indicate your assessment, and add anything additional that should be included in the WALGA submission on the AA6 Framework and Approach to the attached spreadsheet.

The deadline to submit feedback on the framework and approach to the ERA is 6 February 2026. We would like to request your feedback by **27 January at 5:00pm AWST** to allow time for WALGA to prepare a submission and obtain State Council feedback.

Critical Issues

Streetlighting

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

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

Strategic public lighting issues previously identified and not adequately addressed in the current AA5 are:

- Accelerating replacement of old lighting technology with LED lighting

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

- Engagement with customers (Local Governments) prior to introduction of new lighting types
- More comprehensive service standards for street lighting to include lighting levels and spillage (rather than just on or not)
- Introduction of "smart" lighting that meets Local Government needs
- Metering smart lighting
- Introduction of nighttime inspection (as required in AS:1158 or at some other scope and frequency)
- Invoicing for operating lights only
- Transparency of costing / pricing (including valuation of the Regulated Asset Base and components of operation, maintenance and renewal by luminaire type)
- Contestable public lighting maintenance services
- Optional, integrated Local Government owned and operated public lighting

What aspects of Western Power streetlighting should be considered for inclusion in the next Access Arrangement?

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

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

The Public Lighting Code was recently rescinded in Victoria but updated in New South Wales[2].

Is a Public Lighting Code appropriate or is more direct regulatory oversight required in public lighting?

Telecommunications/5G

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

The *Electricity Networks Access Code 2004* requires that the Access Arrangement identify multi-function assets that provide both regulated (covered) services such as streetlighting or electricity distribution and unregulated (uncovered) services such as telecommunications services. Furthermore, each access arrangement must contain a multi-function asset policy, and target revenue for an access arrangement period must be reduced by 30 per cent of the net incremental revenue earned by multi-function assets during that period.

It is not clear whether this reduction in target review applies to Western Power as a whole or is credited to the service such as streetlighting that is otherwise meeting the costs to operate, maintain and renew those assets. While incentives for WP to increase asset utilisation should be maintained these benefits should be shared with customers funding these assets.

[2] New South Wales Public Lighting Code, July 2024 Accessed 12 January 2026

How should the revenue earned from hosting 5G and other telecommunications infrastructure on power poles and street light poles be shared with Western Power customers?

Underground Power Program

The Western Power distribution network strategy for urban areas proposes a tightly meshed network, undergrounded in parts and with operating systems able to support increasing levels of rooftop solar, storage and electric vehicle charging. The network renewal undergrounding program replaces overhead electricity distribution assets with underground power in areas where the overhead assets have deteriorated and require replacement. Delivery of the undergrounding strategy requires co-funding by property owners, at least for the property connection. This co-funding is implemented by Local Governments, subject to Council agreement. The undergrounding program is supported in-principle by Local Governments (State Council Resolution 363.5/2022), subject to affordability.

The New Facilities Investment Test and Net Benefits Guidelines detail the factors considered by the ERA when approving Western Power's capital expenditure and the methods that can be used to value net benefits. Only capital expenditure that meets these requirements can be added to the capital base of the covered network (SWIS) and recovered from network users through regulated tariffs. While the New Facilities Investment Test and Net Benefits Guidelines are not included in the scope of the AA6 Framework and Approach consultation the way in which capital investment is determined or approved could be.

In AA5 the ERA agreed that undergrounding can be a prudent management approach to overhead network renewal but was concerned about deliverability of the magnitude of the work proposed by Western Power, given contractor constraints and time required to undertake community consultation and gain support for projects. Consequently, the ERA required that capital investment proposed for underground power be included in an Investment Adjustment Mechanism. This provides flexibility so that if Western Power over or under delivers against the activity the expenditure variation can be adjusted at the next access arrangement. This ensures that customers are protected by only paying for what Western Power delivers and that Western Power is fully funded if it delivers the programs efficiently and more quickly. To date program expenditure is behind forecast.

Underground power continues to be an important issue for some urban Local Governments.

How should funding for underground power be included in AA6 framework and approach?

What constraints to the underground power program could be resolved through the Access Arrangement?

Reference Services

The Issues Paper defines "reference services" as "...standard services specified in the access arrangement with a published tariff, standard access contract and service standards." (p. 7 of document, p. 14 of PDF).

EV Charging

The current (AA5) Access Arrangement includes an EV Charging service consisting of a daily use of system charge, a time-of-day variable charge, a demand-based charge that varies with network utilisation and a fixed (daily) metering charge. Local Governments providing EV charging may connect to the network under a range of arrangements.

Arguably, this approach ensures network cost recovery but does not encourage establishment of EV charging facilities (because relatively low utilisation coupled with high load-based charges will make the service unviable).

Is the current EV Charging Service tariff an impediment to expanding Local Government EV charging facilities and if so, how should it be changed?

LED Streetlight Replacement Service

The current AA5 includes an Ancillary Reference Service to replace an existing streetlight luminaire with one of the LED luminaires specified in the price list. The regulated price list sets out that this is a user-specific charge that is to be "an amount which reflects the costs to Western Power of replacing the existing streetlight with the LED streetlight replacement requested by the user which may consist of capital and non-capital costs."

Although WALGA is aware that a small number of Local Governments have undertaken bulk luminaire replacement with LED, Western Power reports that there have been no transactions under this Reference Service. The price list does not offer any transparency to Local Governments, with the costs able to include recovering the accounting cost of accelerated depreciation.

How should the LED Replacement Service be specified?

Uncovered / Unregulated Services

Move or Remove Electricity Distribution Equipment

Road improvements and other developments commonly require Western Power assets to be relocated or placed underground. Western Power policy requires that the design and construction work be undertaken by its staff, consultants and contractors. Consequently, there is no competitive market for these services. Prices and delivery times are determined by Western Power.

Since 2021 the time required to undertake typical projects to relocate Western Power assets has increased from around 6 months to reach a peak of around 24 months. Western Power advice is that current timeframes are:

- Move or remove a pole- 75% of projects completed within 17 months
- Move or remove a streetlight – 75 % of projects completed within 16 months

- Larger scale relocations (i.e. more than 4 streetlights) - 75% of projects are completed within 23 months.

Should Move or Remove Electricity Distribution or Transmission equipment become a regulated (covered) service?

What mechanisms would be appropriate to regulate the price and service delivery (including time) given the diversity of situations?

Install New Streetlights

Local Governments may engage Western Power to design and install new streetlights. The process and timing for this is similar to that required for other changes to the distribution network. Western Power commenced trialling a new service (Option B) in mid-2025 for Local Governments choosing to manage design and construction of new streetlights. Uptake to date has been limited.

Should 'install new streetlights' become a regulated service and if so, what mechanisms would be appropriate to regulate price and service delivery given the diversity of situations?

Residential Connections

Recognising the chronic housing shortage in metropolitan and regional WA, there is opportunity to consider what additional provisions could be included in the Access Arrangement to incentivise WP to further reduce connection times and costs.

Currently 75 % of single residential connections are completed within 13 months, with multi-residential development connections typically taking slightly longer. However, the Access Arrangement provides no targets or incentives to reduce residential connection timeframes.

Should the time and cost to provide new and upgraded residential connections be regulated and, if so, how?

Most new and upgraded residential connections are priced under the Distribution Low Voltage Connection Scheme. This Scheme calculates charged based on requested capacity (kVA) rather than on whether the current network will have to be expanded as a consequence of the submitted application and so allows for the cost of infrastructure required for new customer connections to be shared by all customers using the installed network. However, the Scheme does not apply to residential connections more than 25km from the nearest Western Power zone sub-station.

Should the Distribution Low Voltage Connection Scheme be extended to include residential connections in all townsites with existing electricity distribution infrastructure, or what criteria should apply?

Commercial Connections

Local Government projects such as building or upgrading recreation facilities or lighting typically require a new or upgraded commercial connection. Currently a medium sized commercial connection (250A/180kVA to 1300A/1000kVA) is estimated to take 9 – 19 months (75% of projects completed within this timeframe).

Should the time and cost to provide new and upgraded commercial connections be regulated and, if so, how?

Vegetation Management around Power Lines

WALGA State Council adopted a comprehensive urban forest policy and advocacy position including minimum tree canopy target of 30% by 2040 for the Perth and Peel regions (Resolution 061.3/2024) and the State Government is developing an Urban Greening Strategy. A significant proportion of the existing a potential future tree canopy is in public spaces including road reserves where there is potential conflict with overhead electricity transmission and distribution cables.

Local Governments are responsible for ensuring that cultivated vegetation in reserves under their management control does not grow to be within a safe separation distance from power lines. This requires tree pruning, most commonly undertaken by Local Government contractors. However, in some situations this work is undertaken by Western Power crews and invoiced to Local Government.

Should vegetation management (pruning) undertaken by Western Power be a regulated (covered) service?

How should pricing be determined given the diverse range of situations that will arise?

How should the risks of adding even higher costs be mitigated?

Large-scale regional power storage facilities and improvement of distributed power generation storage capacity and utilisation

As significant weather events become more frequent, investment in distributed power storage facilities in regional areas will be critical to maintaining customer access to power at times when feeder connections may be affected. By the same token, areas of the SWIS are highly suitable for the generation of renewable energy. Ensuring that the energy can be efficiently stored and utilised, thus increasing the dispersal and reliability of power supplies, should be an area of focus

for AA6. Technologies such as pumped-storage hydroelectricity could provide a long-lasting solution to power storage, particularly in more remote areas with high renewable energy potential.

Reliability of Power Supply

The reliability of regional electricity networks remains a critical issue for many regional Local Governments. To facilitate and inform strategies to improve reliability, WALGA supports the increased granularity of the performance reporting including by Local Government area and electricity feeder type (which is important to separately identify where a Local Government includes both urban and rural areas).

Are there other geographical, customer or technical criteria that would be useful for reporting, identifying and prioritising reliability performance?

Pole Top Fires

In AA5 the ERA did not accept the proposed significant cost increase for silicone treatment to mitigate the risk of pole top fires. Western Power has nevertheless undertaken a range of treatments to address pole top fire risks.

Does Local Government have views and experiences to include concerning proactive maintenance to mitigate against pole top fires?

Standalone Power Systems

In the current Access Arrangement, the ERA supported standalone power systems as a prudent long term transition strategy for the rural network but adopted a more conservative approach (slower roll out) than proposed by Western Power.

Do Local Governments have views on role of Standalone Power System in the electricity system that could be addressed through the Access Arrangement?

What other matters concerning electricity supply should be included in the framework and approach to the next Western Power Access Arrangement (AA6)?

Please provide any further information in the attached spreadsheet.

Next Steps

Based on response to the identified issues WALGA will provide its recommendations on the Framework and Approach issues paper to the ERA for consideration in assessing and preparing a Framework and Approach for AA6. The next milestone is the release of the draft framework and approach in March/April with further opportunity for consultation.

It is anticipated that Western Power will also commence consultation regarding AA6 with stakeholders, including Local Governments, during 2026. This feedback will inform WALGA's engagement with Western Power.