

4 November 2021



Chamber of Commerce
and Industry WA

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Mr Jai Thomas
A/Coordinator of Energy
Energy Policy WA
Locked Bag 11,
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Via: energymarkets@energy.wa.gov.au

Dear Mr Thomas,

ENERGY AND GOVERNANCE LEGISLATION REFORM DISCUSSION PAPER

Thank you for the opportunity to provide comment on the Energy and Governance Legislation Strategy (the Reform). Open and transparent engagement with industry underpins the advancement of an adaptable and robust electricity system in WA.

The primary role of government in energy markets is to provide regulatory and policy settings that facilitate efficient investment in energy resources and infrastructure. Previous work by the Energy Transformation Taskforce has achieved important advancements in this regard, and we commend the State Government's ongoing commitment to improve the energy policy and regulatory framework.

With respect to the Energy Rules outlined in the consultation paper, we have two areas of feedback.

The first relates to the overarching objective of the Rules. CCIWA supports the three principles identified. However, a principle that is missing, and which goes toward delivering affordable energy to consumers, is promoting competition.

Competitive forces drive innovation, underpin efficient investment and put downward pressure on electricity costs. As such, we recommend the promotion of competition should be included in the overarching objectives of the Rules.

Our second area of feedback relates to market fees. CCIWA is concerned there is a growing push toward increasing the scope of industry funded regulatory functions, without sufficient engagement with industry.

We recommend that any proposal to increase the scope of industry funded functions ought to be consulted on in detail with the sector. Furthermore, it is critically important that regulatory bodies are incentivised to reduce costs and streamline service delivery.

Once again, thank you for the opportunity to submit to the consultation process.

Yours sincerely

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Chris Rodwell
Chief Executive Officer