Chamber of Commerce and Industry WA

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18 August 2026

Jai Thomas
Deputy Director General – Coordinator of Energy
Department of Energy and Economics Diversification
Level 1, 66 St Georges Terrace
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Via email: epwa-submissions@deed.wa.gov.au

Dear Mr Thomas

EPWA Consultation: Distributed Energy Resources

The Chamber of Commerce and Industry of Western Australia (CCIWA) is the peak body advancing trade and commerce in Western Australia, representing businesses of all sizes and the breadth of the economy.

We welcome consultation by the Department of Energy and Economic Diversification (DEED) and Energy Policy WA (EPWA) on distributed energy resources (DER), and the focus on data and connections reform. To frame the consultation, EPWA have provided a research paper (DER Reform paper) which builds on the findings of existing DER Roadmap reports, and the two virtual power plant pilot programs Project Symphony and, we understand, the initial findings from Project Jupiter.

We support efforts to facilitate virtual power plants, as there are multiple benefits for taxpayers and industry when delivered effectively. For example, the reduced cost to energy consumers through saved costs in reducing transmission buildout, decarbonised energy sovereignty, and greater on-demand power delivery.

As we highlighted in our recent report, Powering WA's Future, reducing the cost of energy ultimately makes WA a more competitive place to live and do business. We support policy settings which ensure competitiveness, are technology agnostic, and align messaging across industry and all levels of government. One of our key recommendations was for the State Government to support behind-the-meter options that reduce transmission requirements to support the overall affordability of the energy transition.

In general, we welcome the proposed principles of better data quality, making it easier for businesses to connect DER, and better understanding of how virtual power plants (VPPs) mitigate grid impacts and maximise opportunities.

However, we highlight the need for future DER policy settings to clearly signal intent and provide better coordination, which would provide certainty to industry.

Future DER intent needs to be reinforced by actions

Members have provided feedback that there is a reticence from Western Power, and Synergy, to connect private DER on commercial or industrial property to the grid. The DER Reform paper does not address these concerns, instead, it is framed as helping DEED to better shape future DER investment. Where technology exists at lower cost, and there is an ease of access, then members have indicated a willingness to purchase and use DER, and to broadly electrify their operations.

Indeed, in the last few years alone, DER is becoming more accessible. However, as there is greater interest in private entities in purchasing DER, they will need clear pathways and approvals. Businesses will also need to remain connected to the grid, enabling the purchase of power if required. Ultimately, a ‘connect it’ approach would be the preferred outcome, simplifying the process significantly and reducing existing barriers and certification processes.

With this in mind, we recommend a clear and explicit ‘connect it’ approach to DER. The result may be a more distributed grid, however, it will reduce the overall cost to taxpayers and help industry deliver a more resilient energy system. A regulatory sandbox, or stewardship approach could help to identify existing barriers and determine solutions.

Coordination and aggregation – a missing piece

Project Symphony and Project Jupiter benefitted from Synergy acting as an aggregator and lead agency. However, Synergy has an interest in generating returns to support a dividend to government.

The ERA has, historically, been the default regulator and coordinator for networks in Western Australia. With oversight of Western Power’s access arrangements, as well as Horizon Power, the ERA may be better placed to coordinate future DER policies and regulations.

To this end, we recommend EPWA consider the appropriate entity to facilitate the long-term coordination of aggregators, generators, and storage providers. The Future Energy Systems Outlook (FESO), which is currently in development, should set clear targets for DER uptake across the SWIS, NWIS, and isolated networks.

The energy transition is one of the most significant environmental, social and economic challenges of our time. We thank you again for the opportunity to provide comment on DER, and we look forward to engaging on future energy system discussions as they arise.

Should you wish to discuss the content of this letter further, please do not hesitate to contact Dr Daniel Kiely, CCIWA Chief Economist, via email at

Yours sincerely

Will Golsby
Chief Executive Officer