

Pilbara ISOCo Outage Planning Workshops

2026

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Agenda

- Welcome and introductions
- Meeting topic, process and etiquette
- Overview of feedback on consultations to date
  - DISCUSSION: Is the summary of alignment, areas for clarity and disagreement correct?
- Current outage process and problem statement
- Proposed Outage Planning process – high level
  - DISCUSSION: Acknowledging more detail will be placed in procedures as indicated, is this a good process? How could it be improved?

Welcome and Introductions



Outage Workshops Process



Competition and Consumer (CCA) Law Obligations Reminder

If a Member has a concern regarding the competition law implications of any issue being discussed at any meeting, please bring the matter to the immediate attention of the Chairperson.

Part IV of the CCA (titled "Restrictive Trade Practices") contains several prohibitions (rules) targeting anti-competitive conduct. These include:

(a) **cartel conduct**: cartel conduct is an arrangement or understanding between competitors to fix prices; restrict the supply or acquisition of goods or services by parties to the arrangement; allocate customers or territories; and or rig bids.

(b) **concerted practices**: a concerted practice can be conceived of as involving cooperation between competitors which has the purpose, effect or likely effect of substantially lessening competition, in particular, sharing Competitively Sensitive Information with competitors such as future pricing intentions and this end:

- a concerted practice, according to the ACCC, involves a lower threshold between parties than a contract arrangement or understanding; and accordingly; and
- a forum like the EPNRWG is capable being a place where such cooperation could occur.

(c) **anti-competitive contracts, arrangements understandings**: any contract, arrangement or understanding which has the purpose, effect or likely effect of substantially lessening competition.

(d) **anti-competitive conduct (market power)**: any conduct by a company with market power which has the purpose, effect or likely effect of substantially lessening competition.

(e) **collective boycotts**: where a group of competitors agree not to acquire goods or services from, or not to supply goods or services to, a business with whom the group is negotiating, unless the business accepts the terms and conditions offered by the group.

A contravention of the CCA could result in a significant fine (up to $500,000 for individuals and more than $10 million for companies). Cartel conduct may also result in criminal sanctions, including gaol terms for individuals.

Sensitive Information means and includes:

(a) commercially sensitive information belonging to a Member's organisation or business (in this document such bodies are referred to as an Industry Stakeholder); and

(b) information which, if disclosed, would breach an Industry Stakeholder's obligations of confidence to third parties, be against laws or regulations (including competition laws), would waive legal professional privilege, or cause unreasonable prejudice to the Coordinator of Energy or the State of Western Australia).

Guiding Principle – what not to discuss

In any circumstance in which Industry Stakeholders are or are likely to be in competition with one another a Member must not discuss or exchange with any of the other Members information that is not otherwise in the public domain about commercially sensitive matters, including without limitation the following:

(a) the rates or prices (including any discounts or rebates) for the goods produced or the services produced by the Industry Stakeholders that are paid by or offered to third parties;

(b) the confidential details regarding a customer or supplier of an Industry Stakeholder;

(c) any strategies employed by an Industry Stakeholder to further any business that is or is likely to be in competition with a business of another Industry Stakeholder, (including, without limitation, any strategy related to an Industry Stakeholder's approach to bilateral contracting or bidding in the energy or ancillary/essential system services markets);

(d) the prices paid or offered to be paid (including any aspects of a transaction) by an Industry Stakeholder to acquire goods or services from third parties; and

(e) the confidential particulars of a third party supplier of goods or services to an Industry Stakeholder, including any circumstances in which an Industry Stakeholder has refused to or would refuse to acquire goods or services from a third party supplier or class of third party supplier.

Compliance Procedures for Meetings

If any of the matters listed above is raised for discussion, or information is sought to be exchanged in relation to the matter, the relevant Member must object to the matter being discussed. If, despite the objection, discussion of the relevant matter continues, then the relevant Member should advise the Chairperson and cease participation in the meeting/discussion and the relevant events must be recorded in the minutes for the meeting, including the time at which the relevant Member ceased to participate.

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Overview of Designing Rule Change

23 September
Foundations

- Agree purpose and outcomes
- Agree meeting processes
- ACCC lens applied to consultation process and outcome
- Review summary of consultations to date
- Agree areas of alignment
- 'Problem' statement
- High-level process map
- Rule change outline discussion
- 'Hurdles' to supporting rule change
- Establish 'parking lot' for items outside of rule change.

14 October
Design

- Potentially high-level co-design of the following depending on 'hurdles' raised in Foundations Meeting:
  - Principles of outage reporting to ISOCo decision (materiality criteria)
  - Principles of ISO risk/impact assessment process
  - Compensation process options
  - Pathways for urgent, short outages
- Allocate matters for rules, procedures, guidance and drafting of proposed rule change
- Rule change draft and optionality if possible – discussion of benefits and risks.

4 November
Test and Commit

- Review consolidated high-level overview of framework, process and governance for rule change
- Scenario test high level processes
- Agree rule change terms

Documenting participant positions

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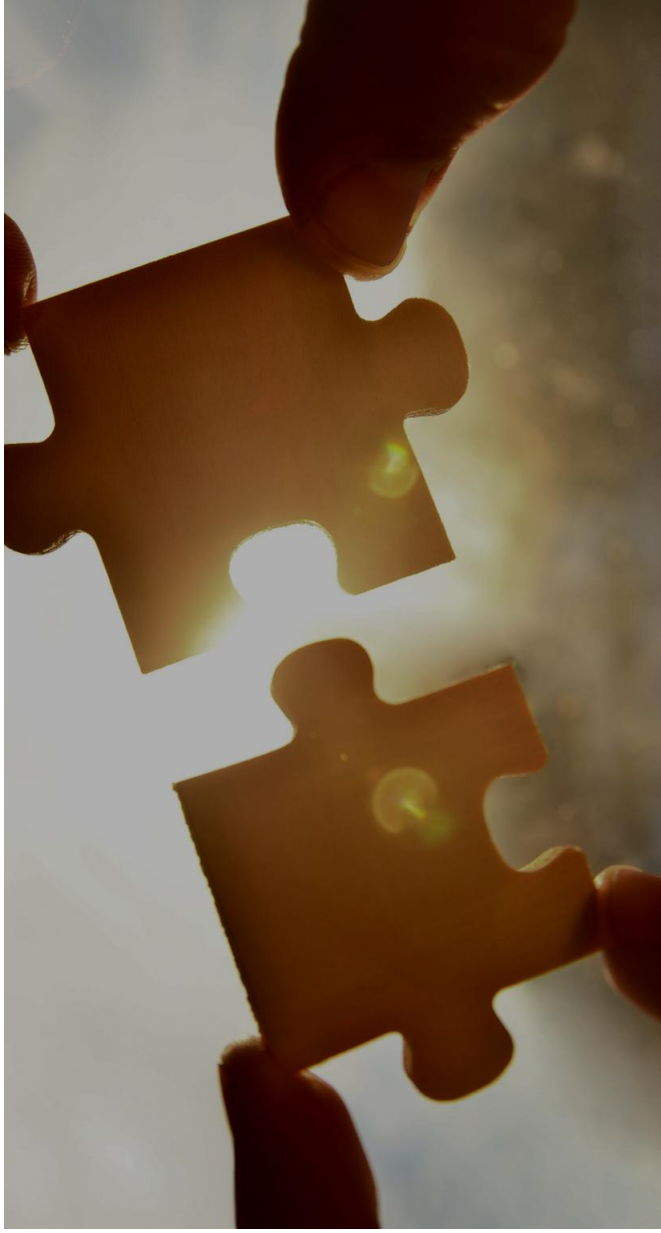
For a successful meeting…beforehand

- Read this slide deck thoroughly
- Seek internal views before the meeting
- Come prepared to contribute meaningfully
- We want your input and ideas to find the best way forward
- Try to attend in person
- RSVP attendance and mode for catering requirements

For a successful meeting…during

- Stay on topic: Outage Planning
- Parking lot of items out of scope that need to be captured
- 1 speaker at a time
- Make your point directly and succinctly
- Listen respectfully
- Be mindful of ACCC compliance
- Meeting is recorded for minutes

Previous Consultations



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Context

This section summarises previous consultations and submissions, including:

- 7.3 and 7.4 Review Draft Decision and 5 stakeholder submissions
- EPNR Consultation Paper and 9 stakeholder submissions
- EPNR draft Implementation Plan and 8 non-public stakeholder submissions
- Pilbara ISOCo's Blackout Investigation Report and 6 non-public stakeholder submissions.

October 24	February 25	October 25	November 25
Subchapter 7.3 and 7.4 Consultation	EPNR Consultations	Implementation Plan Consultations	Blackout Investigation Report Consultations

Alignment Philosophically

Philosophy

- 'Lighter' regulatory approach is preferred to minimise compliance costs.
- ISO has a role in outage planning coordination considering system security risks, cost and mitigation materiality where the outage affects other participants.
- The outage planning and submission process should be transparent and impartial.
- Outage planning should only apply to Integrated Mining Networks and not interfere with Pluto Facility operation (as per existing rules).
- Costs of outage impacts on other participants/NWIS operation should be allocated by ISO on a 'causer/beneficiary pays' basis.
- Outage planning process must find the balance between protecting commercially sensitive information and providing transparency.
- Outage planning needs to consider infrastructure beyond transmission network.
- Standard outage plan submission requirements and assessment process across all participants.

Assumptions

- All participants will utilize the outage risk assessment framework.
- ISO will employ suitably qualified and credible industry professionals to evaluate outage plans.
- ISO will act with transparency and impartially.
- Outage planning process will define clear timelines for Participants and ISO.
- Rules around Pluto will not change as a result of this outage process.

Overview of Positions

Aligned

- 'Light' regulation
- Minimising increasing costs of ISO
- ISO has a role in outage planning
- Causer/beneficiary pays principle – cost recovery/penalty mechanisms must be defined
- Whole of NWIS N-1 compliance is costly
- Supporting outage planning underpinned by a risk-based framework while maintaining Participant flexibility
- Commercial sensitivities
- Transparent process for reclassifying non-credible contingencies during high-risk outages
- Outage window is preferable to allow for external approvals and cyclonic conditions
- Focus on transmission outages alone is insufficient
- Preference for a no 'disadvantage' principle in approach
- Procedural fairness
- Publish outage planning in advance

Clarify

- Framework application
- Managing risk within own assets
- System strength and reliability standard require context/definition
- Modelling discrepancies (ISO v NSP)
- Urgent maintenance post storm/visual inspection
- Outage considerations of:
  - access/connection terms
  - delayed maintenance causing costs and reliability issues
  - gaming by Participants
  - ESS allocation of ISO directions
  - rights of impacted parties
  - uncovered network application
  - economic management of contingency risk mitigations may not be proportionate to level/duration of risk
  - costs of consulting with all affected parties
  - natural events (e.g. cyclones) causing delays in outage scope
  - flexibility for short, minor outages
  - ISO declining maintenance plan - process clarity and compensation
- Equipment list: beyond transmission items
- Prescriptiveness of equipment list

Objection

- 1 year notice of outage too long
- 1 week notice of cancel/ reschedule of outage by ISO inadequate and costly
- Planned outages interfering with Integrated Mining Network/Pluto Facility operations and ISO rights to direct in these circumstances
- Mitigations without consideration of cost-benefit implications. Not all mitigations are reasonable.
- Whole of NWIS N-1 network reliability requirement, albeit mostly agreed as aspirational
- Land access provisions for miners under pastoral lease occupancy arrangements if outage directions cause energy supply to non-mining uses (State Agreements)
- Excessive conservatism in risk evaluation on outage planning

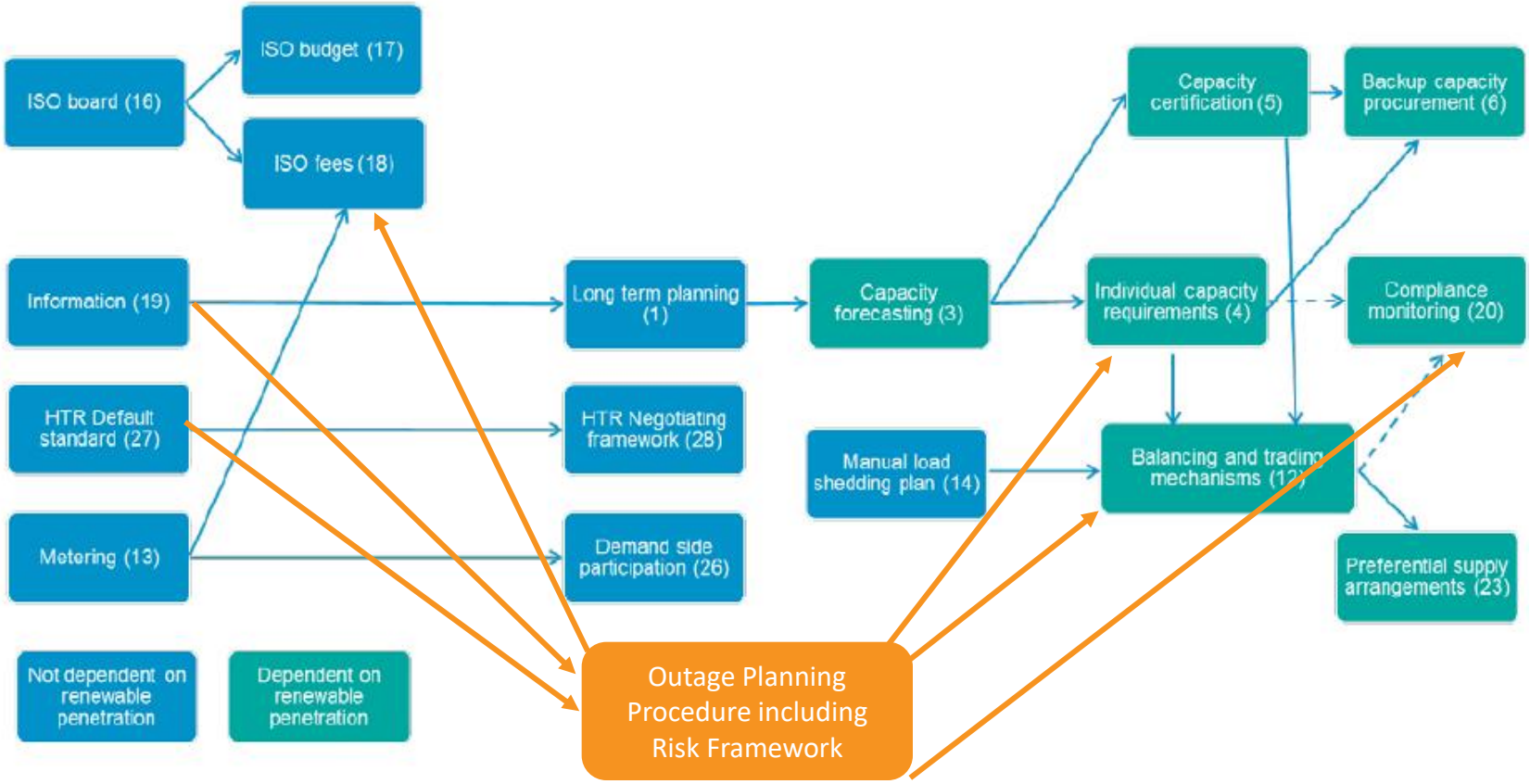
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Q: Does this reflect our feedback?

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Dependencies for Implementation

Interdependencies are acknowledged. Items belonging in other scopes, shall be added to a 'parking lot' for safekeeping and addressing as the other implementations progress.

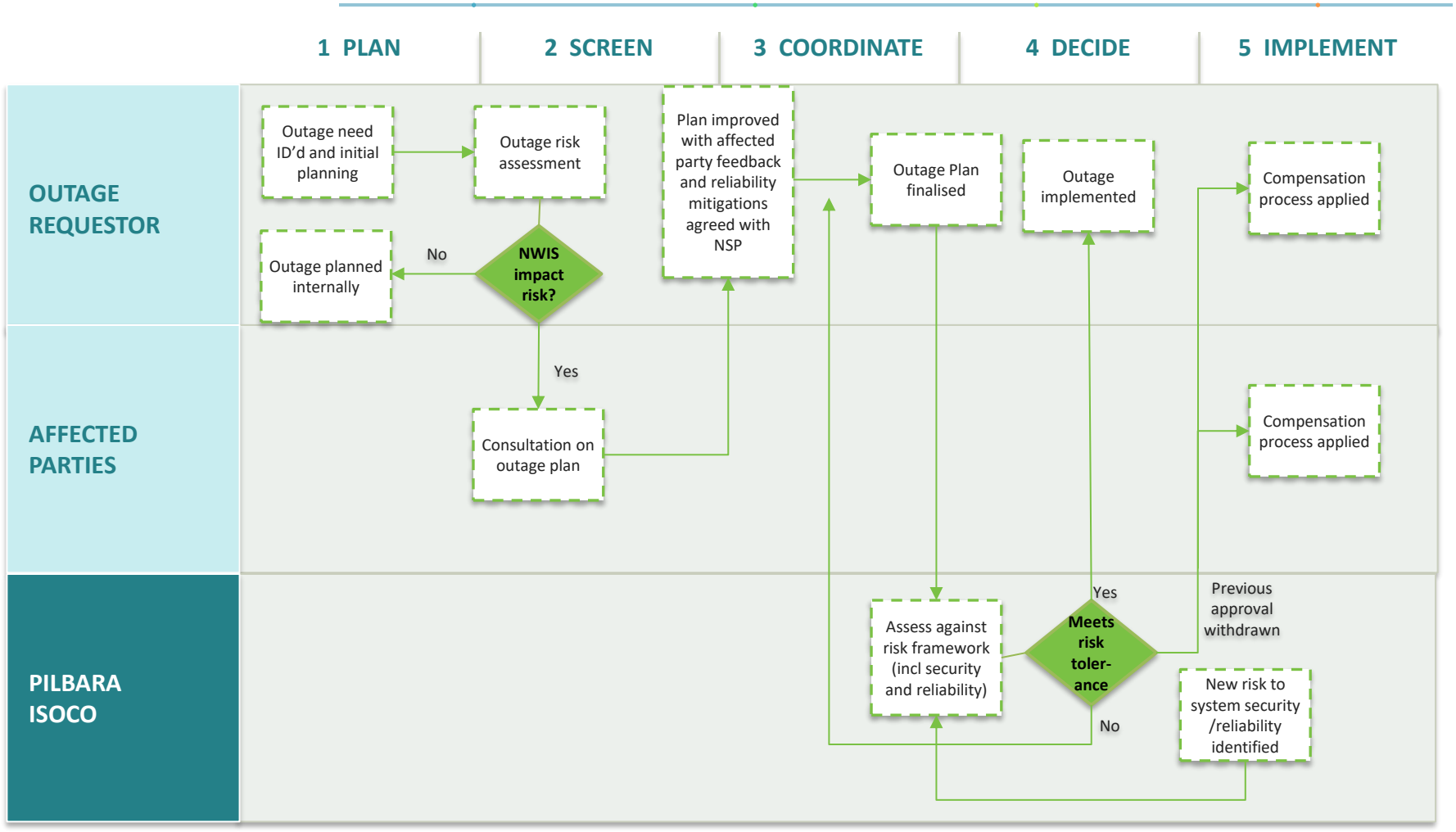


EPWA Draft Implementation Plan page 19

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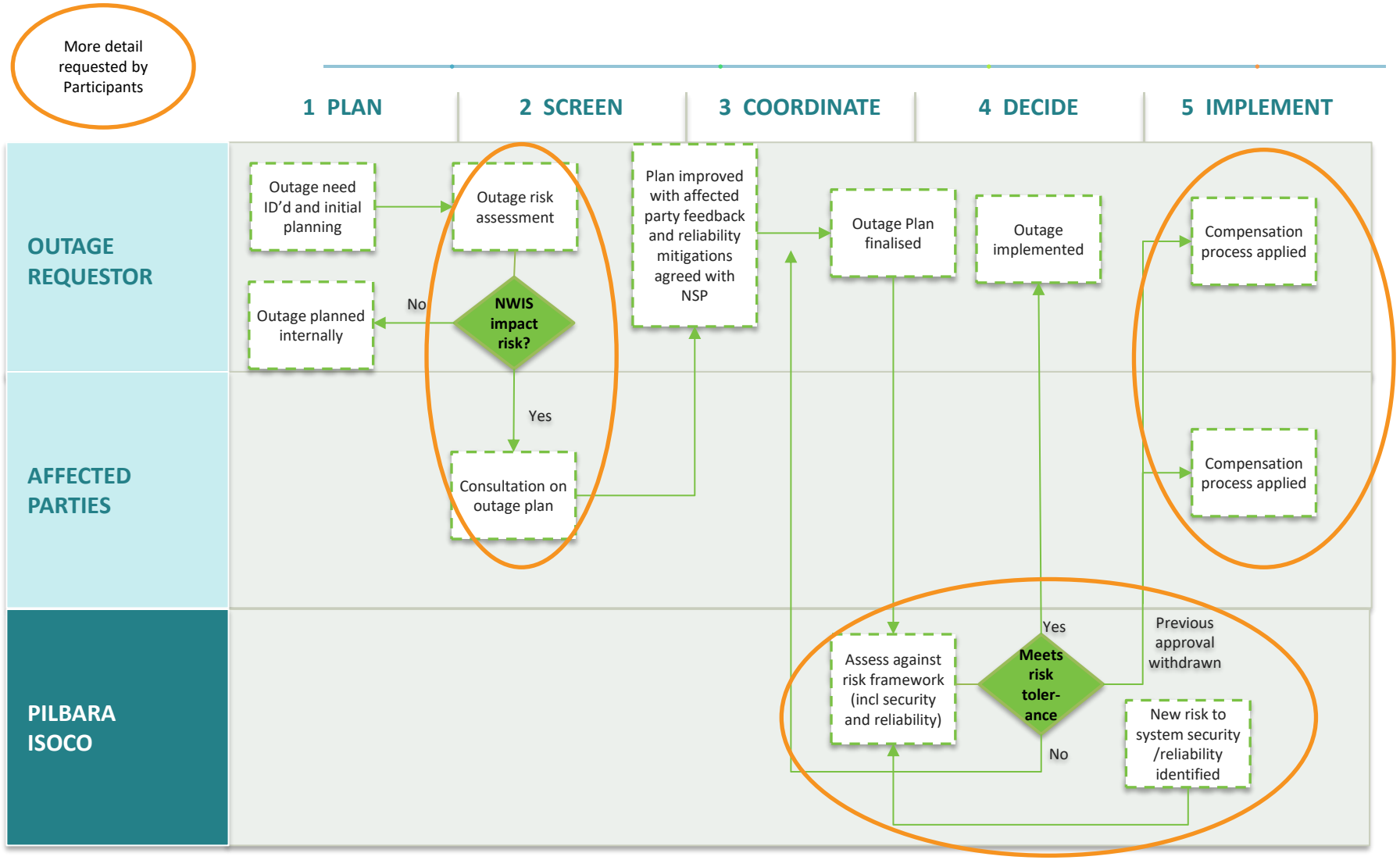
Synopsis of consultation outage planning process



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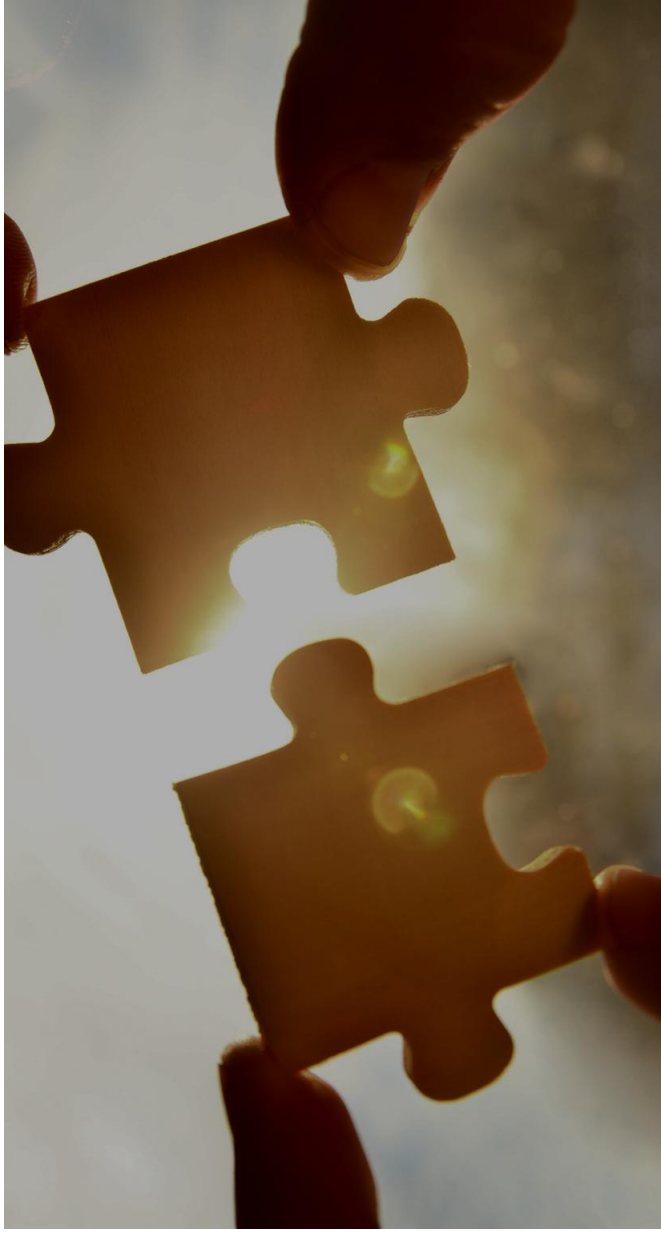
Synopsis of consultation outage planning



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Current process

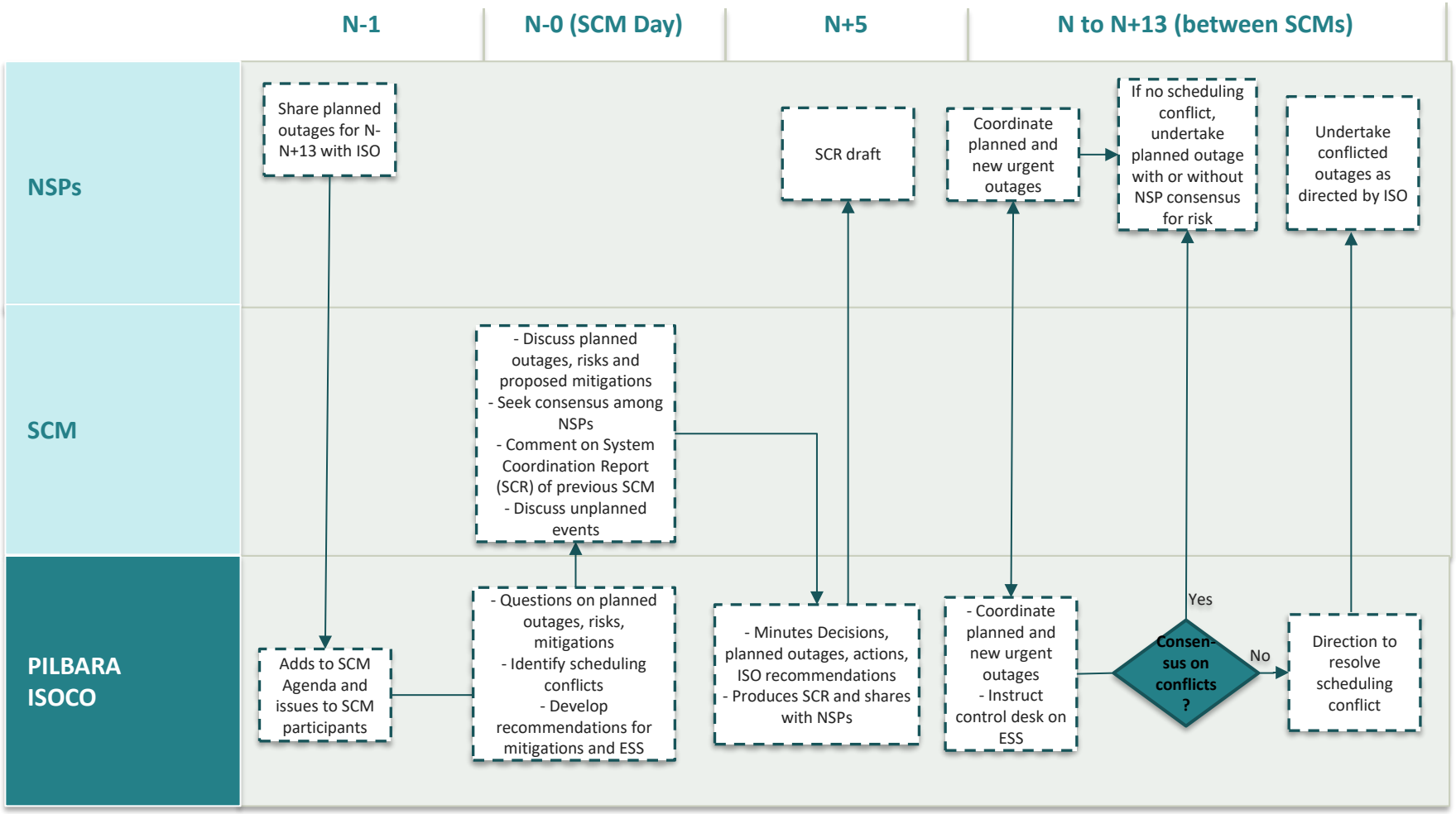


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Current Outage Planning Process

(System Coordination Meeting –SCM)



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Pilbara ISO's Observations

- Participants are making **risk decisions** on behalf of other participants and competitors
- Participant risk decisions may not be **aligned** to the **risk profiles** of the impacted Rules participants and there is no mechanism to resolve this
- Insufficient structure to **enable robust planning and coordination**
- Insufficient guidance to participants on **acceptable risk outcomes** and impacts on the NWIS
- The NWIS needs a **bespoke solution** – although we can learn from others it is unlikely appropriate to 'copy' other solutions to outage planning
- ISO is keen to maintain **participant autonomy** as much as practicable
- A common risk assessment process will ensure all parties are making **comparable risk decisions** within the tolerance of the NWIS
- Outage planning process must be **transparent** to meet ACCC requirements



Purpose:

Defining the Workshop purpose and outcomes

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Purpose of Workshops

To provide certainty to Participants over intention and content of proposed **rule changes for planned outages**.

To provide opportunity for Participants to contribute to the codesign of the proposed rule changes and/or have opinions on the proposed rule changes transparently recorded.

To align on the need and content of a PNR change to accommodate the implementation of:

1. a Risk Framework against which planned outages may be assessed by Participants and the ISO; and
2. criteria for inclusion of equipment that must be reported to the ISO if an outage of that equipment is planned by a Participant.

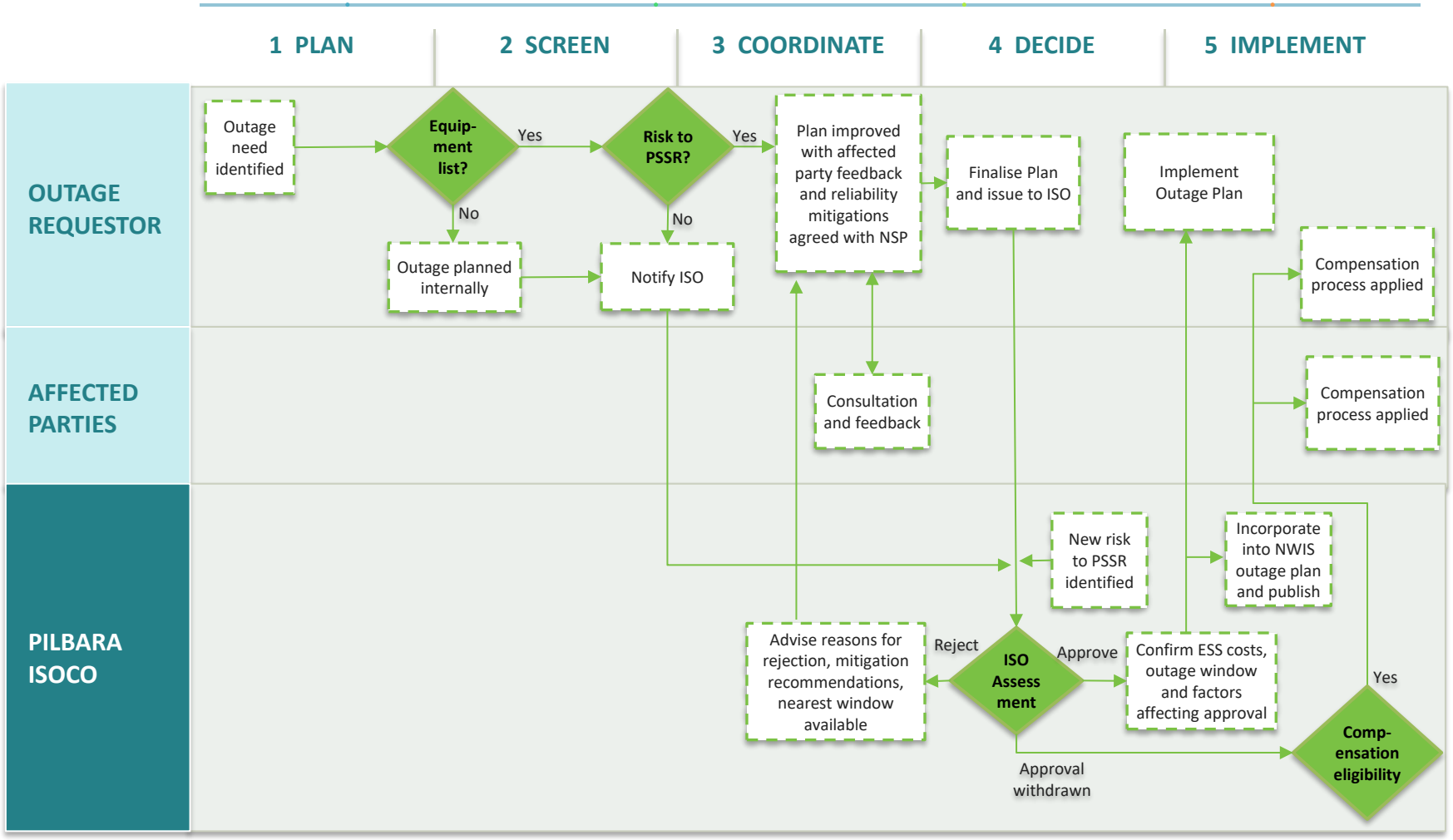
Desired Outcomes:

1. Agreed need for PNR change to improve outage planning
2. Agreed structure/content for PNR change to improve outage planning
3. Commencement of defining the next steps, such as risk framework construct and criteria for equipment inclusion

Outage Planning Process



Suggested outage planning process



Q: Is this a good process?

Q: What should change?

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Discussion

Considerations in Key Decision Points

(Procedure content)

Equip-ment list?

Vertically Integrated Mine equipment to:
- deliver ESS
- provide visibility
- operate interconnectors

Covered Networks equipment:
- at Tx level
- to control Tx voltage
- to balance a portfolio
- to provide ESS
- to operate interconnection
- to provide visibility
- Generation: >10MW
- Storage: >10MW

Risk to PSSR?

PSSR risks include outages that create:
- reduced reliability
- lack of reserve
- loss of ESS
- loss of voltage control
- loss of fault current
- loss of balancing

ISO Assess-ment

Assessment to consider due diligence of:
- Risk Assessment
- Outage Plan
- Evidence of consultation with affected parties
- Scheduling conflicts
- ESS requirements

Compen-sation Eligibility

For detailed consideration at subsequent workshop

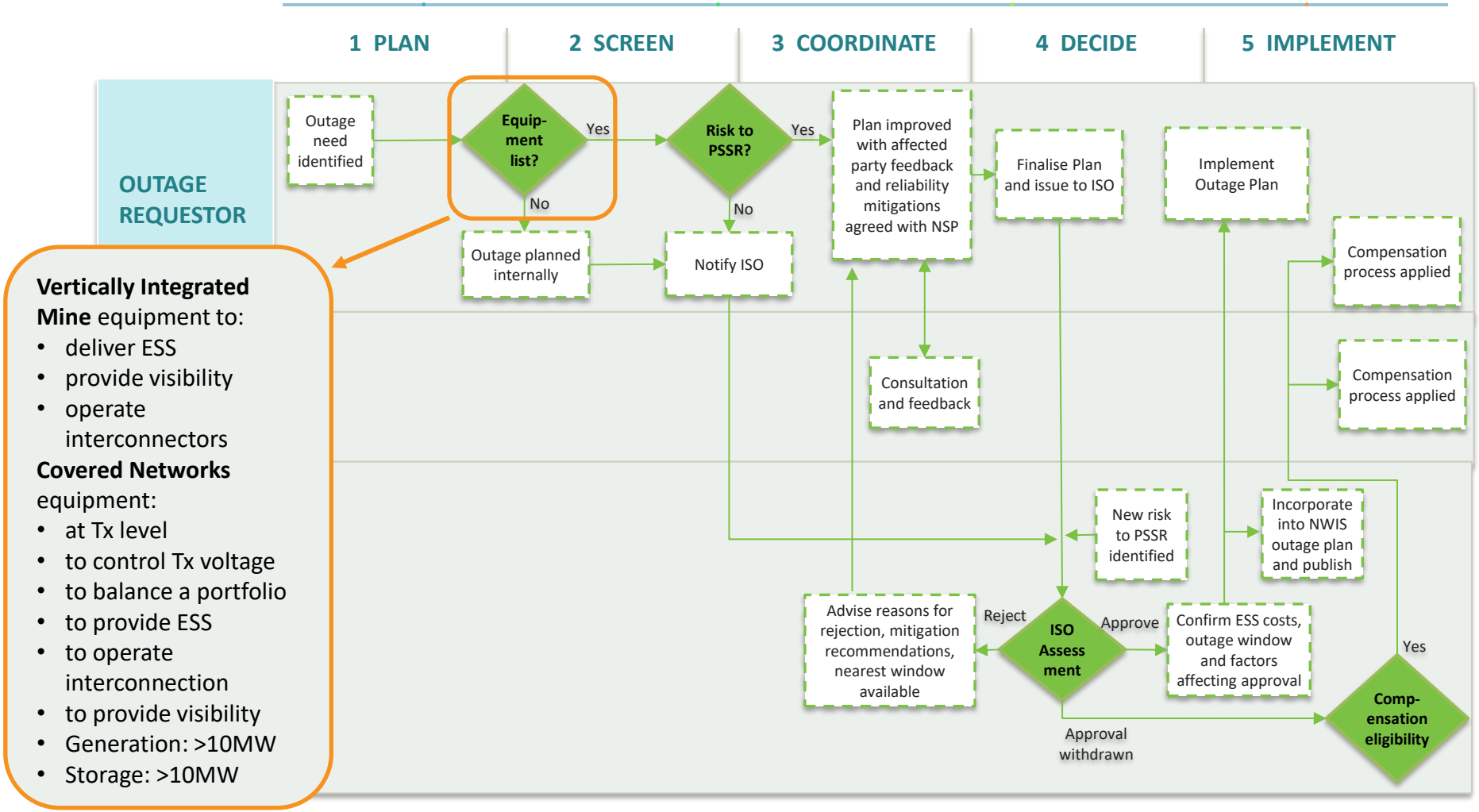
Needs substantial thinking around sunk costs, timing and payments, such as:
- Participant direct compensation (causer/ beneficiary pays)
- Compensation via ISO (likely increasing ISO fees)
- Standard court damages claims process

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Q: Are these reasonable?
Q: What should change?

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Suggested outage planning process



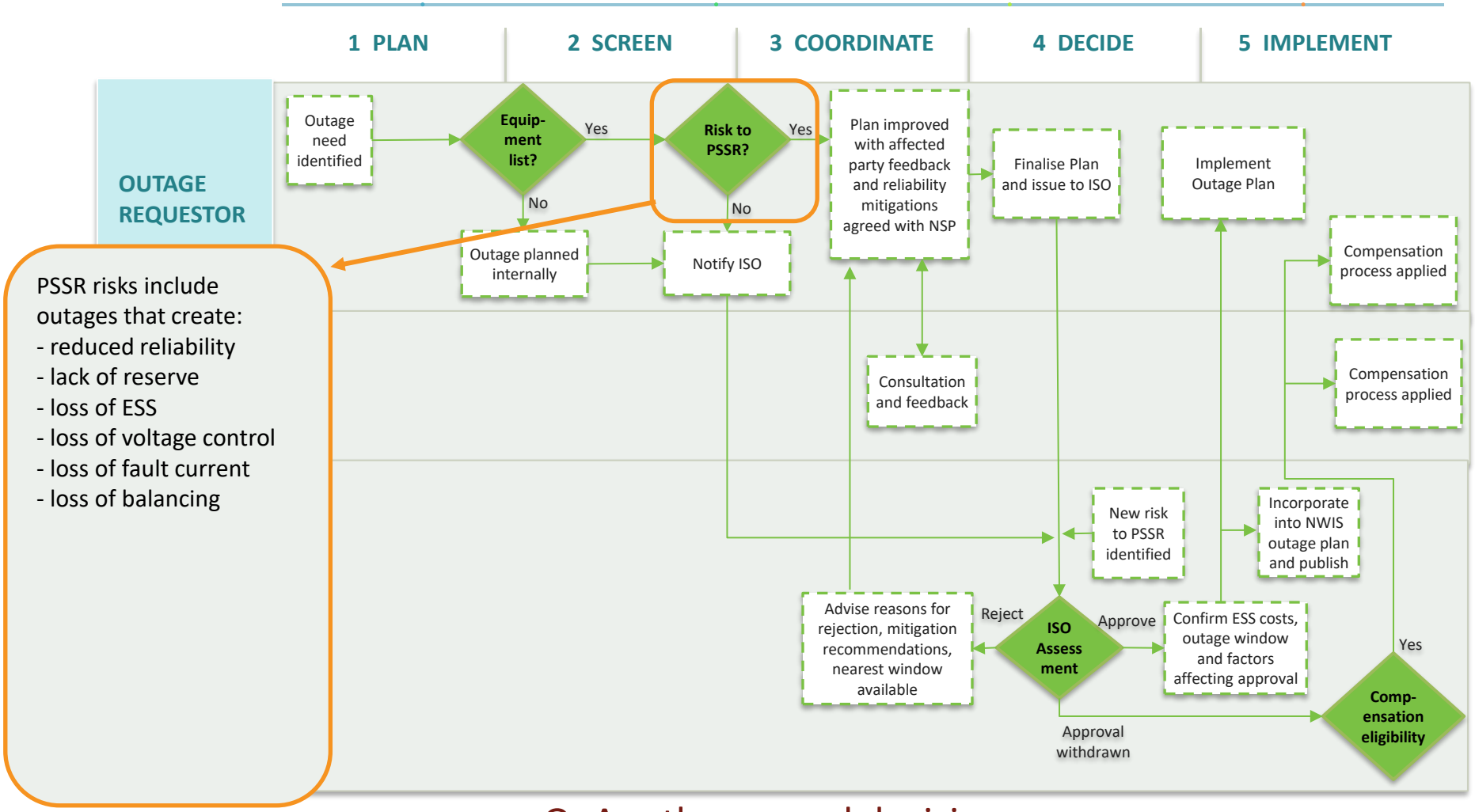
Q: Are these good decision principles?

Q: What should change?

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Suggested outage planning process



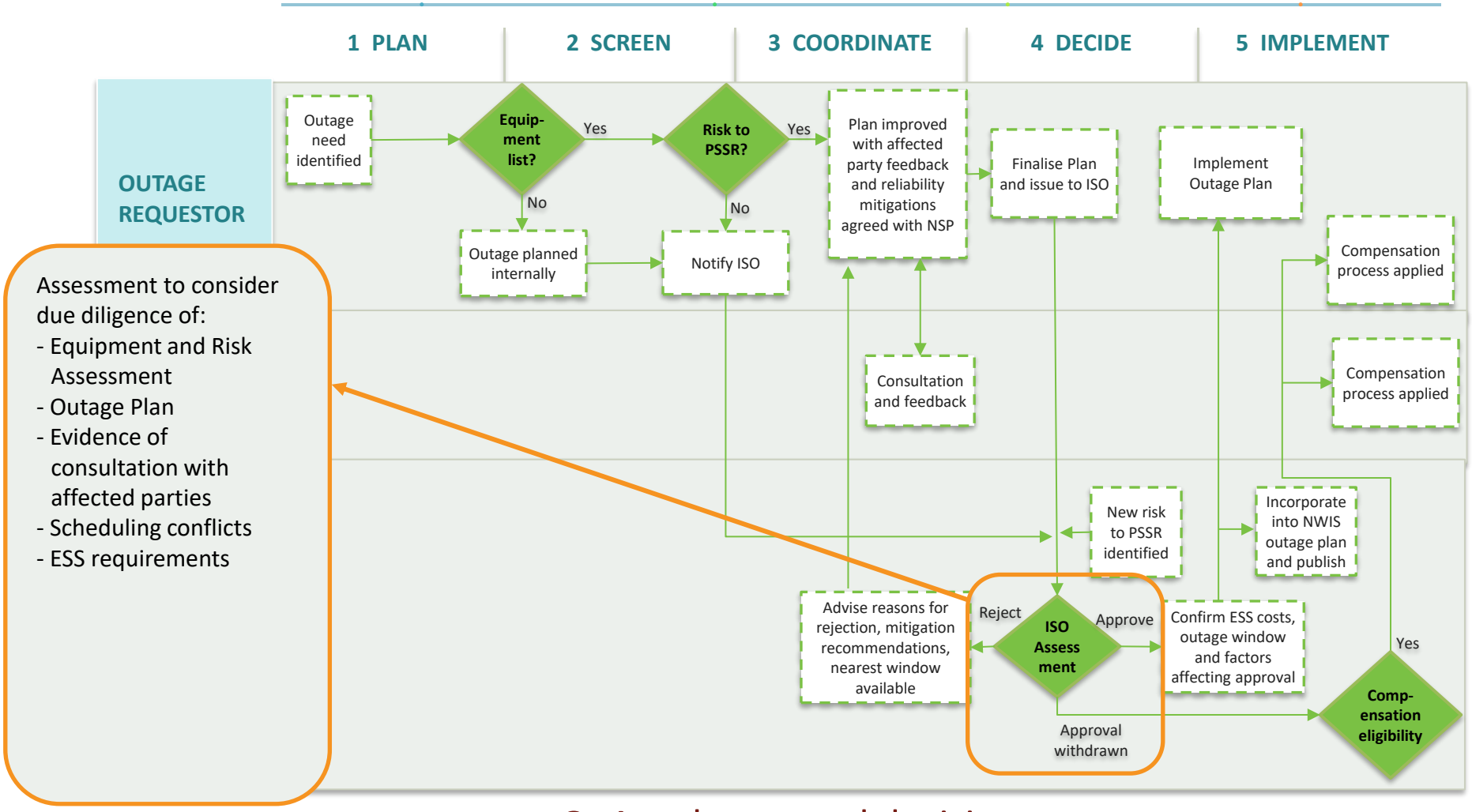
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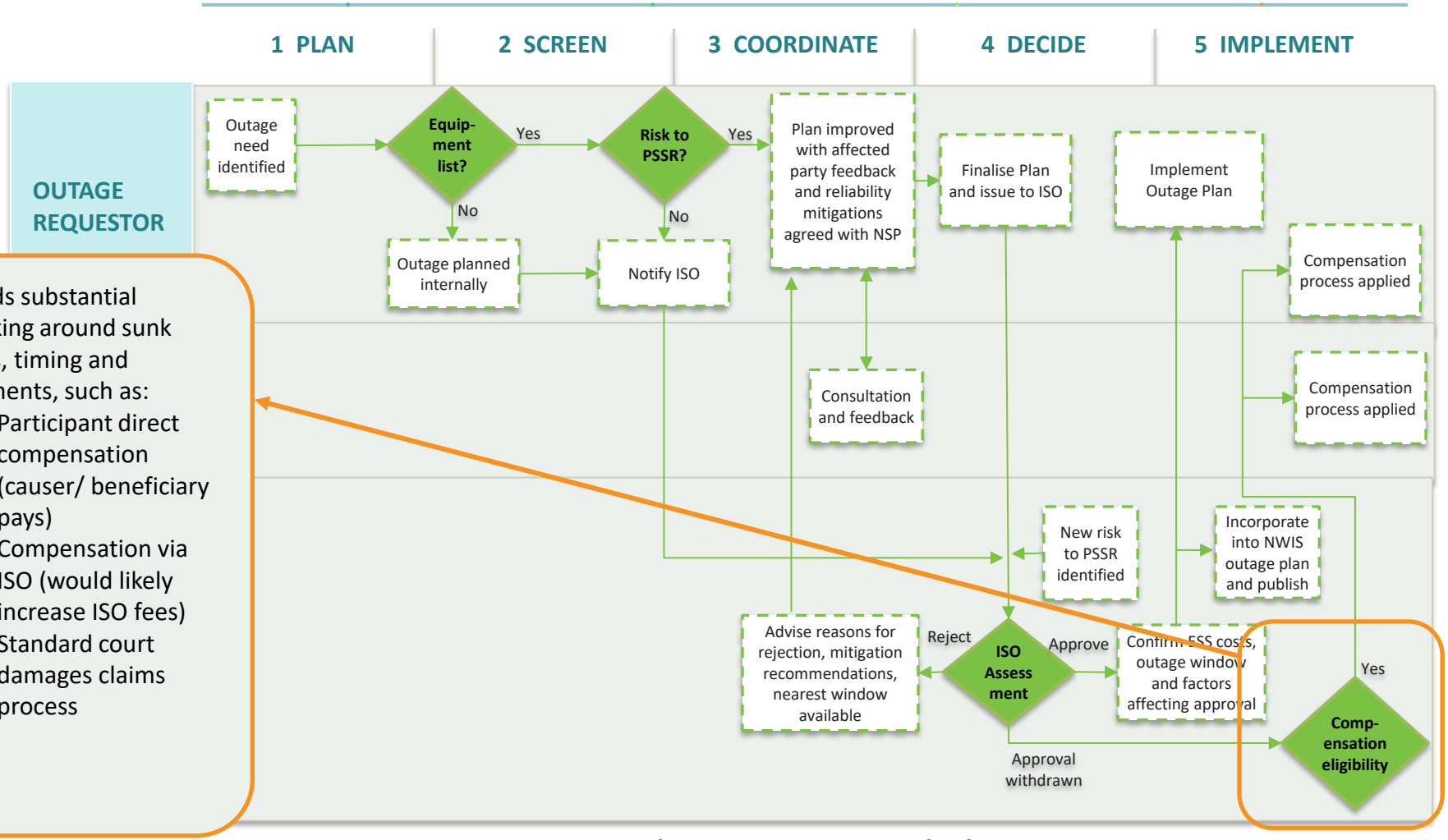
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Suggested outage planning process



Needs substantial thinking around sunk costs, timing and payments, such as:

- Participant direct compensation (causer/ beneficiary pays)
- Compensation via ISO (would likely increase ISO fees)
- Standard court damages claims process

Q: How can this transparently be structured to minimise overall costs to ISO and Participants?

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Thank you

Please provide feedback on how things went today:

https://form.menti.com/s/aldkp5puhhda

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