GOVERNMENT OF WESTERN AUSTRALIA

Department of Energy and Economic Diversification

Energy Policy WA

Evolution of the Pilbara Networks Rules (EPNR) Working Group (PNR Workstream) - Minutes

Date:	23 September 2026
Time:	09:30am – 12:25pm
Location:	Level 1, 216 St Georges Terrace and Teams

Attendees	Company	Comment
Peter Van Den Dolder	Chair, Pilbara ISOCo	
Dr Helen Todd	Stratsys	ISO consultant - Presenter
Summa McMahon	Pilbara ISOCo	
James Campbell-Everden	Pilbara ISOCo	
Neil Gibbney	Pilbara ISOCo	
Lewis Peaty	Pilbara ISOCo	
Guy Tan	Horizon Power	
Noel Michelson	Rio Tinto	
Lizzie O'Brien	APA	
Shane Potter	APA	
Nathan Kirby	BHP	
Jasper Ng	BHP	
Glen Carruthers	Fortescue	
Ken Chong	Fortescue	
Reece Tonkin	Yinjibarndi Energy Corporation	
Nick Bardsley	Woodside	
Dora Guzeleva	EPWA	
Other attendees	**From**	**Comment**
Alex Jones	TransAlta	
Maurice Ryan	Horizon Power	
Noel Moyo	Horizon Power	
Paul Grey	APA	
Tom Coates	EPWA	
Rory Hannon	EPWA	
Matthew Kok	Rio Tinto	

Matt Bowen	Energy Transformation	ISO consultant – Competition Advisor
Alistair Duffy	RBP	
Abdul Al-Oraimi	Pilbara ISOCo	
Jobin James	Pilbara ISOCo	

1. WELCOME

Dr Todd opened the meeting with an Acknowledgement of Country.

2. MEETING APOLOGIES AND ATTENDANCE

Meeting attendance was noted as listed above.

3. COMPETITION LAW

Mr Bowen introduced himself and noted he was attending to provide advice on competition law matters, both during the meeting and in the development of the Outage Coordination process.

Mr Bowen outlines members' obligations of members under Australian Competition Law, which Working Group members acknowledged.

4. PROPOSED OUTAGE PLANNING PROCESS

Dr Todd presented Slide 7-9, noting that the Working Group series would comprise three meetings and is intended to provide stakeholders with an opportunity to contribute to the design of a proposed rule change relating to outage coordination.

The workshop would review previous consultation feedback, discuss a proposed outage coordination process, identify barriers to stakeholder support and capture out-of-scope issues separately for future consideration.

Dr Todd presented slides 10-13, providing an overview of the key themes, stakeholder feedback and positions arising from the consultations undertaken between October 2024 and November 2025. Members were invited to confirm that the summary accurately reflected their views.

- Mr Ryan noted that the 'causer/beneficiary pays' element should be explored in more detail.

Dr Todd agreed but noted that this would not be covered in this workshop series as it was one of the more complex issues.

Dr Todd presented slides 14-16, providing an overview of the proposed outage coordination process.

- Mr Tan noted that the way the process map flows may create a loop as an amended plan must return to affected parties for re-coordination, effectively restarting the process.
- Mr Ryan considered that the fundamental issue is to clarify accountability for risk assessments, including the roles of NSPs, loads and generators. He noted that, while

the Harmonised Technical Rules (HTR) contain defined thresholds for system security, their application in a non-normal operating state is not always well understood by all parties.

- Mr Michelson noted that likelihood and consequence have long been a grey area in risk assessment, as participants view them very differently, which may lead to disagreement about the risk itself.
- Mr Ryan agreed but considered that a risk assessment has limited value unless the risk can be accurately defined and ranked, and the required controls identified.
- It was noted that some level of risk is unavoidable and that the process should enable, rather than discourage, necessary maintenance through appropriate risk assessment and controls. Defining what constitutes a risk is a critical first step in the process.

The Chair presented slide 19-20 describing the existing outage coordination process and ISO's observations.

- Mr Ryan considered that the Rules provide a relatively clear risk position and encourage NSPs to work collaboratively and questioned whether more detail is required. He noted that the NWIS is a constrained network with limited interconnection and bottlenecks, but that participants understand these constraints well and the network is generally highly reliable.
- Mr Grey cautioned against overcomplicating the process, suggesting that members should first agree what constitutes the normal system steady state, and then assess whether outages can be managed to maintain the system within that state.

The Chair stated that the current process works for most planned outages but noted that the system is evolving.

- Mr Moyo considered that a key issue is the lack of a common risk appetite across NSPs. He noted that an agreed risk framework would support consistent decision-making and help ensure that planned outages can proceed without compromising long-term reliability.
- Mr Tan suggested that, given the limited number of assets in the NWIS that present risk, a risk mitigation approach with mitigations agreed per asset may be preferable to applying a full risk assessment framework to every outage.

Mr Bowen highlighted a potential cartel conduct between competitors even when undertaken to maintain system security and reliability.

- Mr Gibbney questioned how risk would be assessed asset by asset without a framework, noting that likelihood and consequence would inform how much could be spent on additional ESS, which returns to the question of who pays.
- Mr Ryan considered that the Rules and the HTR already set the power system performance parameters and that the gap arises when operating outside those parameters.

The Chair presented Slide 23, providing an overview of ISO's proposed outage coordination process.

- Mr Ryan noted that consultation with affected parties becomes more complex where connection agreements already reflect agreed trade-offs between connection cost and security of supply. He considered that affected parties may object to outages when consulted, making the process difficult to navigate.

- Mr Michelson considered that the reference to "any risk to PSSR" is too broad, as all activities carry some level of risk, and suggested that a materiality threshold be introduced.
- Mr Ryan noted that the Rules already link risks to credible contingencies and suggested that further clarification of what constitutes a credible contingency may be a simpler way to establish an agreed risk position.
- Mr Grey considered that any risk management process requires an escalation step, so that risks above an agreed level are escalated to people with the authority to accept them.

The Chair agreed and noted that the risk framework procedure is intended to provide that materiality view on risks.

- Mr Tan asked about timeframe for implementing the proposed changes to the outage coordination process.

The Chair confirmed that timing is critical but had been deliberately excluded from the proposal as it cannot not be settled within the workshop series.

- Mr Michelson noted that the process should accommodate all scenarios, including outages planned well in advance and urgent outages, such as a transformer oil leak requiring an outage within 48 hours.

The Chair advised that urgent outages may need to be managed through a specific approach.

The Chair presented Slides 27-28, outlining the proposed equipment list that would be subject to the outage planning process.

- Mr Grey questioned the envisaged scope of equipment providing visibility to the ISO Control Desk.

The Chair advised that the equipment list is intended to capture equipment that provides real-time visibility to the ISO Control Desk and noted that it could be limited to equipment necessary for the ISO Control Desk to carry out its functions under the Rules.

- Mr Michelson suggested that the framework should consider ESS in terms of the service provided rather than the asset delivering it and noted that an alternative provider could potentially supply the same service when an asset is out of service. Mr Michelson also reiterated that "present a PSSR risk" should be read in the context of the "to the extent reasonably necessary" wording of Rule 5.
- Mr Ryan noted that risk appetite is an important consideration. He suggested that connected and connecting facilities clearly articulate their risk appetite, particularly where supply is dependent on a single transmission line.
- Mr Bardsley noted that Woodside's facilities would likely be subject to internal planning only, and asked how, and how often, the ISO would need to be notified, suggesting that existing planning documents could be used.
- Mr Ryan considered that introducing a consultation process may create unnecessary complexity where relevant risk positions have already been agreed through connection agreements.
- Mr Jones suggested that, where connection agreements already apply, consultation could be limited to notifying potentially affected parties. He noted that impacts of planned outages on generation are sometimes missed in internal planning.

Dr Todd explained that direct consultation between outage owners and affected parties could raise ACCC concerns. Consultation through the ISO was considered preferable, as it avoids competitors engaging directly with one another.

Mr Bowen noted that the process cannot be used to increase contracted entitlements and that parties with a contract with the outage owner are governed by that contract.

- Mr Bardsley noted that LNG facilities already hold an ACCC authorisation to collaborate on shutdowns and asked whether the Working Group could identify the best approach and seek authorisation if required.

Mr Campbell-Everden advised that this can be explored, provided the benefits outweigh the cost and administrative burden.

Mr Bowen noted that the ACCC would consider whether the same public benefit could be achieved without authorisation, and whether the proposed conduct delivers a public benefit that justifies it.

The Chair clarified that NSPs will continue to coordinate outages with their own customers under access contracts, and that consultation would apply only where an outage affects a participant with no contractual relationship with the outage owner.

- Mr Carruthers considered that the process is unnecessarily complex and that NSPs should be able to schedule outages and notify affected participants, provided they continue to meet the applicable planning criteria. He noted that difficulties in obtaining outages may increase connection costs and suggested that the process should prioritise enabling NSPs to undertake outages efficiently
- Mr Tan considered the proposed equipment list too granular and reiterated his preference for agreed mitigation measures. He noted that further consultation could lead customers to object to agreed outages after field resources have been committed.
- Mr Sng noted that BHP is connected to two NSPs and suggested that consultation requirements be agreed in advance for each item of equipment to avoid unnecessary consultation and streamline the process.
- Mr Grey suggested that the process be fit for purpose, with an agreed and robust risk management framework and an escalation process to address situations where agreed controls are exceeded. Mr Grey also noted that the key issue is managing situations where parties disagree, as an NSP can currently proceed with an outage outside the agreed risk boundary.
- Mr Michelson considered that the risk framework in the ISO's Compliance Procedure is a reasonable starting point as it links consequence to defined events but noted that it is not consistently applied.

Mr Campbell-Everden noted that, while the Compliance Procedure could be a starting point for the risk assessment, it was drafted for compliance with the Rules more broadly and does not resolve the process questions being considered.

- Mr Carruthers considered that outage planning process should be based on planning criteria in the technical rules. Mr Gibbney noted that planning criteria were deliberately excluded from the HTR, as they belong to each NSP.
- Mr Ryan considered that acceptable power system performance for different contingency levels could be set in the HTR, which would be quicker than developing a new procedure.

The Chair distinguished between the system security objective in the Rules, which is to keep the power system within the technical envelope defined by the HTR, and each network's

reliability planning criteria. He added that one NSP's planning criteria may not address another NSP's and that the proposed process is intended to bridge this gap.

- Mr Grey confirmed that the proposed process works for APA, provided that an agreed risk framework is established.
- Mr Ryan considered that there is no current crisis, and that slight differences in risk tolerance could be resolved by clarifying them. He cautioned that additional bureaucracy would increase the cost and complexity of connecting to the NWIS.
- Mr Bardsley supported keeping the process simple.

The Chair noted strong alignment on the need for a common risk framework with the two key questions: what is done with a completed risk assessment and how coordination between competitors is undertaken where required.

- Mr Carruthers considered that clearly specified power system performance standards should act as the risk framework for planning outages.

The Chair noted that gaps would remain around likelihood and consequence and questioned whether parties agree on these when they connect.

- Mr Carruthers noted that connecting parties accepting the applicable standards are responsible for understanding the reliability of their connection and that further consultation would add unnecessary complexity.
- Mr Tan noted that all NSPs apply the same frequency operating standard, which could form the basis of a risk framework, with mitigation measures applied where the standard cannot be met.

The Chair noted that the gap lies in outage owners having differing judgements of likelihood and consequence, which a common risk framework would address.

- Mr Carruthers considered that part of the gap is that the Rules do not define credible contingencies under planned outage conditions.

The Chair agreed on the need for clarity on credible contingencies, noting that the ISO had proposed including this in a procedure rather than in the HTR or the Rules.

- Ms Guzeleva stated that anything with a potential financial or other consequence for participants must be in the Rules rather than a procedure, and that compliance should be achieved by design.

Dr Todd summarised that members broadly agreed with the beginning of the process but not with the risk assessment content as drafted.

Action item: Members to email ISO with suggestions on the proposed risk assessment process.

Action item: ISO to return to members with a revised consideration of the risk assessment process, considering members' comments and feedback.

- Mr Tan noted that a further consultation step and fixed publication date could disrupt customer negotiations and sought certainty that an outage can proceed once agreed mitigation measures are applied.

Dr Todd noted that, where mitigations address the risk, the outage owner would notify the ISO and proceed.

- Mr Ryan stated that Horizon Power strongly opposes the ISO approving its planned outages and considered that the proposal risks over-engineering compliance for a small number of well-understood outages already managed through system coordination.
- Ms O'Brien noted that APA considers the proposed framework should only apply only in very few situations and that APA would be happy to discuss its thinking on the escalation process at the next workshop.

Action item: Members to come prepared to the next workshop to discuss the escalation process.

Dr Todd invited members to provide feedback on the workshop through the QR code provided.

5. GENERAL BUSINESS

The meeting closed at 12:25pm.