

Minutes

Meeting Title:	Evolution of the Pilbara Network Rules (EPNR) Working Group (Workstream 2- HTR)
Date:	14 November 2024
Time:	9:30 AM – 11:30 AM
Location:	Online, via TEAMS

Attendees	Company	Comment
Dora Guzeleva	Chair, Energy Policy WA (EPWA)	
Tim Robinson	Robinson Bowmaker Paul (RBP)	
Nik Walker	APA	
Rebecca White	BHP	
Lekshmi Jaya Mohan	BP	
Anthony Guevarra	CITIC Pacific Mining	
David Stephens	Horizon Power	
Peter Van Den Dolden	ISOCco	
Scott Hiscock	Woodside	
Laura Koziol	EPWA	
Luke Commins	EPWA	
Tom Coates	EPWA	
Ajith Sreenivasan	RBP	
Eija Samson	RBP	
James Seidelin	RBP	

Item	Subject
1	<p>Welcome and Agenda</p> <p>The Chair opened the meeting with an Acknowledgement of Country.</p> <p>The Chair noted the Competition Law Statement, and reminded members of their obligations and encouraged them to raise any Competition Law issues with her if they arise.</p> <p>The Chair highlighted that this was the final meeting for the working group for the calendar year and noted that the primary objective was to finalise the recommended actions for the HTR Issues identified by the group.</p>
2	<p>Meeting Attendance</p> <p>The Chair noted the attendance as listed above, including apologies from Ms Anderson (ERA), Mr Michelson (Rio Tinto) and Mr Mlilo (BHP).</p>
3	<p>Minutes of Meeting 2024_10_10</p> <p>The working group approved the Minutes as circulated with the meeting papers.</p>
4	<p>Action Items</p> <p>The Chair reviewed the action items in the register. She acknowledged Action Item 1 and confirmed EPWA's intent to provide members with a copy of the HTR content in the draft consultation paper for feedback, shortly before the draft consultation paper is provided to the PAC.</p> <ul style="list-style-type: none"> Mr Van De Dolder addressed the second action in the register, advising that the ISO's functions and funding allocations did not accommodate studies for revised facilities' ride-through requirements. He noted that the ISO could lead this work if it receives additional funding, resources and internal approvals. <p>The Chair suggested that funding and responsibility for this study should be considered as an early implementation plan activity.</p> <ul style="list-style-type: none"> Mr Walker addressed the third action in the register, advising that APA's concerns had been clarified in the relevant Issue Paper (Issue 29) included in the meeting materials.
5	<p>HTR Issues Workbook</p> <p>The Chair acknowledged correspondence from Mr Stephens requesting further discussion on the WEM (Wholesale Electricity Market) Power System Security and Reliability (PSSR) Standards Review work and its applicability to the NWIS, as well as a clarification on the position regarding automatic versus minimum versus negotiated standards in the HTR.</p> <p>The Chair reflected on the PSSR Standards Review content presented at the last meeting, and the material circulated to members afterwards. She reiterated that the materials focus on how system strength issues are forecast and who is responsible for producing the forecasts.</p> <p>The Chair summarised Mr Stephen's feedback that the direction of the PSSR Standards Review could translate well to the NWIS, and that an early implementation activity should be to consider the extent to which the PSSR proposals are applicable and could be adapted for the Pilbara.</p> <ul style="list-style-type: none"> Mr Stephens agreed in principle with the summary of his views. Mr Walker emphasised a need to frame this "as far as practicable" rather than 'as applicable', due to the differences between the two power systems, but otherwise agreed with the proposal. Mr Van De Dolder questioned whether forecasting should be handled by NSPs or the ISO, noting that the aim is to avoid duplication of work and additional costs.

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	<ul style="list-style-type: none"> Mr Walker noted that fault levels can be influenced by other networks. He acknowledged that NSPs could produce the forecast but considered that the ISO should have a role in providing guiding principles and scenarios. Mr Van De Dolder agreed and indicated that this aligned with the current rules. He added that, given some networks are small, the ISO would have to undertake most of the forecast process alongside the NSPs and, as such, it may be efficient for the ISO to have responsibility for system strength forecasting. <p>The Chair agreed that ISO has a role to play in long term planning. She highlighted that the unsolved question of who would be responsible for fixing system strength problems once they emerged.</p> <p>The Chair reiterated that answering these questions would be early implementation activities and noted the group's consensus to consider the PSSR Standards Review as the starting point for those inquiries.</p> <p>The Chair recapped discussions on automatic versus minimum standards. She outlined that the HTR would be based on an automatic standard that, once satisfied, assured connection applicants of access. She explained that this did not preclude requests for, or negotiation of, a lower standard. The Chair noted that, in due course, minimum standards would be developed below which negotiations could not happen.</p> <p>The Chair said that negotiations could either go below the automatic standard, provided agreement with the NSP had been reached, or that the NSPs can also request a higher standard than the automatic. However, if the access seeker did not agree to meet a higher standard, the automatic standards would provide a backstop to prevent prolonged negotiations and disputes.</p> <p>She emphasised that any negotiated standard would need to be transparent to provide confidence and promote accountability in the Pilbara regime.</p> <ul style="list-style-type: none"> Mr Stephens proposed including minimum standards in the development roadmap and considering interim measures for compliance oversight. <p>The Chair outlined that the ISO should play an oversight role in negotiations impacting PSSR, and the consultation paper would propose a dispute resolution mechanism.</p> <ul style="list-style-type: none"> Mr Walker asked for further guidance and clarification for when the negotiating NSP would need to consult with the ISO, and when they would have discretion to agree deviations from the automatic standards. Mr Van De Dolder noted that the ISO would consider and respond to a party's request to be involved in an access negotiation. He agreed that the ISO should have an oversight role and publish guidance to assist NSPs to identify when they have discretion (i.e. location-based matters). In negotiations that affect the security of the wider system, the ISO must have a final say. <p>The Chair agreed that the ISO must be empowered to reject arrangements that may threaten system PSSR.</p> <p>Mr Robinson facilitated a discussion on all Issues listed in the HTR meeting workbook (circulated 7 November 2024), to finalise recommendations for inclusion in the consultation paper.</p> <p>A draft copy of the consultation summary table was circulated to members for comment and feedback on 02 December 2024. A final version will be published alongside these Minutes as a record of the meeting.</p> <p>Two specific actions from this discussion are recorded in these Minutes to assist with project management.</p>

Item	Subject
	<p>ACTION: EPWA will contact Mr Michelson for any further updates on proposals for Issues 3, 44 and 45, and, if necessary, circulate revised recommendations to the working group.</p>
	<p>ACTION: EPWA to circulate papers and proposals for Issues 35 and 38 to the working group.</p>
<p>7</p>	<p>Next Steps</p> <p>Mr Robinson asked if there were any items left to be discussed that were not already raised. He indicated that any new issues would not be addressed in the consultation paper but could be captured in the implementation plan.</p> <ul style="list-style-type: none"> • Mr Van De Dolder suggested formalising the treatment of non-synchronous systems in the HTR. <p>The Chair asked if members had contemplated a move away from the term “generating systems” to “energy producing systems” to cover storage projects.</p> <ul style="list-style-type: none"> • Mr Van Der Dolder explained that clause 3.7 in the HTR allowed NSPs and the ISO to treat storage works as generating facilities during injections and as consumer facilities during withdrawal, and that this approach was workable and had been applied to several projects. He indicated that, for now, it is workable for the ISO and NSPs. However, eventually, a new section in the HTR for storage would be needed as recommended in the Issues Paper 8. <p>Mr Robinson added that the PNR workstream would amend Chapter 3 of the PNR and other parts of the rules to facilitate the participation of storage. He noted that this would include introducing the term ‘energy producing systems’, which would cover both generation and storage, while the proposed changes to the HTR would address more specific issues.</p> <ul style="list-style-type: none"> • Mr Walker raised the concern that, while the HTR had evolved around synchronous machines that had no inherent cost to provide short term overload, applying the same rules to semiconductor-based systems, which would have significant costs to achieve overload, did not align with the cost efficiency objectives. • Mr Walker also mentioned issues with high voltage and frequency events and expectations of overload capability leading to disconnection of equipment. To that end, he wanted to know if others in the Working Group had raised or recognised that as an issue to be addressed. <p>The Chair acknowledged the issues raised by Mr Van Der Dolder and Mr Walker and asked them to provide a brief written summary of these issues to assist EPWA to capture these issues’ descriptions in the implementation plan.</p> <p>The Chair indicated that another new issue for the working group to consider was where compliance with the technical standards should be applied, i.e. whether it is at the connection point with the NWIS or at individual pieces of equipment behind the connection point.</p> <ul style="list-style-type: none"> • Mr Van Der Dolder clarified that, in the HTR, compliance was already at the connection point for generator requirements unless specified otherwise. However, Mr Van Der Dolder recognised that further clarity for non-synchronous facilities may be required. • Mr Walker agreed that further clarity is required in the HTR to show that compliance was at the connection point and that exceptions should be listed if a different assessment is required, noting that for current synchronous equipment the performance or voltage measurements is at the terminals. • Mr Stephens noted that there are different types of connection points, which include the connection point of a generator and the connection point between networks, using the example of Woodside network equipment being connected to the Horizon Power network. To avoid confusion and to ensure accurate compliance with the Rules, the

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	<p>different types of connection points need to be defined clearly and approached differently.</p> <ul style="list-style-type: none"> • Mr Walker agreed with Mr Stephens' concern, using the example of a 'hybrid system' for which solar, wind and batteries are treated as one entity. <p>The Chair stated that this was an important issue to be discussed and addressed before hybrid facilities with co-located storage components became more common in the Pilbara.</p> <ul style="list-style-type: none"> • Mr Stephens asked what the next steps were for this working group. <p>The Chair outlined that the consultation period would be extended beyond February.</p> <p>The Chair indicated that this working group may need to reconvene to discuss any submissions made; if any essential rule changes to the HTR were required in advance of the implementation plan; and, of course, to provide input into the development of an implementation plan.</p> <p>The Chair reiterated that this was the final meeting of the HTR Working Group for the year and thanked all the members for their time and contributions. She commended members for their positivity and productive input, noting that significant progress had made on several HTR issues.</p>
<p>ACTION: Mr Van Der Dolder and Mr Walker to provide brief summaries of the Issues raised in discussion to ensure they are addressed in the implementation plan.</p>	

The meeting closed at 10:56am.