



26 June 2020

Steve Edwell  
Energy Policy WA  
PERTH WA 6000

Dear Mr Edwell,

### **Energy Transformation Strategy Access Code Changes Consultation Paper**

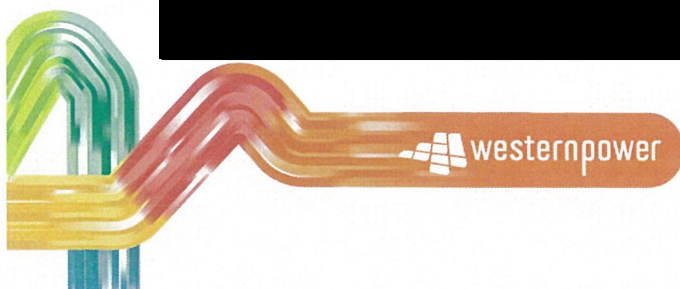
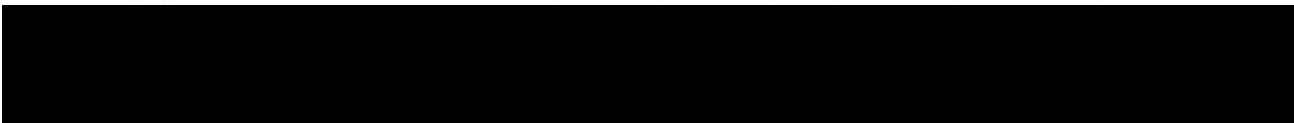
Western Power appreciates the opportunity to provide this submission on the Energy Transformation Strategy Proposed Changes to the Electricity Networks Access Code Consultation Paper published on 14 May.

The Electricity Networks Access Code 2004 (the Code) has not been significantly amended since it was created in 2004 and Western Power appreciates the efforts made by the Energy Transformation Implementation Unit (ETIU) to update the Code to reflect changes in the industry since this time, as well as the significant reform program currently underway.

Western Power has been actively engaged in the drafting process for the proposed amendments to the Code and is broadly supportive of the changes outlined in the consultation paper. However, Western Power would like the following two refinements to be made to the Code to ensure that it can implement the proposed changes.

1. The consultation paper states that there will be a requirement for Western Power to publish a "Network Opportunities Map" (NOM) each year by 1 October. Chapter 15 of the Code proposes a range of transitional arrangements relating to the implementation of the proposed amendments, but does not specify a transitional start date for the NOM. Western Power believes that 1 October 2021 would be a more appropriate transitional date to produce the first NOM.
2. ETIU has introduced concepts of multi-function assets and tariff structure statements, which are welcomed by Western Power. However, including these obligations under clause 5.1 (which defines what an access arrangement must include), could be interpreted to require the immediate update of Western Power's access arrangement. Western Power would therefore prefer that these requirements are clarified to ensure that updates are only required as part of Western Power's Fifth Access Arrangement, which is due to commence on 1 July 2023.

Western Power will continue to work with your team on the detailed implementation of these changes to the Code.



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