



## Pilbara Networks Rules Rule Change Proposal Submission

### PRC\_2022\_01: Integrated LNG Systems

Submitted by:

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Submissions on Rule Change Proposals can be sent by:

Email to: [energymarkets@energy.wa.gov.au](mailto:energymarkets@energy.wa.gov.au)

Post to: Coordinator of Energy  
Attn: Director, Wholesale Markets  
C/o: Energy Policy WA  
Locked Bag 11, Cloisters Square  
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#### 1. Please provide your views on the proposal, including any support, objections, or suggested revisions.

Alinta Energy broadly supports the draft rule change report noting that the proposed connection point compliance process and the improved controls over the new *integrated facility* can be used to address our initial concerns for the security and reliability of the NWIS and for the Pilbara electricity objective.

However, we consider that as drafted, the proposed amending rules may inadvertently bias the use of the proposed *integrated facility* category towards operations that use thermal generators, and unduly exclude those using renewable generation, presenting a relative barrier to their connection.

225A requires an *integrated facility* to comprise both *consumption equipment* and *generating works*. We consider that this may exclude sites with renewable generation because unlike thermal generation, renewable generation would be located where the renewable resource is best and this tends not to be co-located with the load.

To avoid excluding renewable generation utilising the *integrated facility* category, we recommend EPWA consider removing the requirement for an *integrated facility* to comprise *consumption equipment* (in rule 25A(1)(a)).

**2. Please provide an assessment whether the change will better facilitate the achievement of the Pilbara electricity objective.**

The Pilbara electricity objective is to promote efficient investment in, and efficient operation and use of, services of Pilbara networks for the long-term interests of consumers of electricity in the Pilbara region in relation to —

- (a) price, quality, safety, reliability and security of supply of electricity; and
- (b) the reliability, safety and security of any interconnected Pilbara system.

Alinta Energy considers that the proposed connection point compliance process, and the improved oversight of the new *integrated facility* category better facilitate the achievement of the Pilbara electricity objective compared to the initial proposal by reducing risks to security and reliability and reducing the likelihood that the ISO would need to rely more heavily on directing other facilities in performing its primary function.

However, we consider that removing the requirement for an integrated facility to comprise *consumption equipment* may further facilitate the achievement of the objective by removing barriers to investment for renewable generation that would be otherwise able to meet the criteria of an *integrated facility*.

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**3. Please indicate if the proposed change will have any implications for your organisation (for example changes to your IT or business systems) and any costs involved in implementing the changes.**

The proposal will not require Alinta Energy to make changes to its IT or business systems.

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**4. Please indicate the time required for your organisation to implement the change, should it be accepted as proposed.**

Not applicable for Alinta Energy.

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