



## Pilbara Networks Rules Rule Change Proposal Submission

PRC\_2023\_01

### Various Pilbara ISO Functions

Submitted by:

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<b>Date submitted:</b>	8 May 2023

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.

Further to the Pilbara ISOCo's Rule Change Submission (PRC\_2023\_01) and specifically related to the discussion at the Pilbara Advisory Committee meeting on 30 March 2023 with regard to Proposal B –

- The Pilbara ISOCo strongly supports the transition of the interim procedures in A4.57 PNR to become permanent following appropriate consultation.

Related to this is the provision in A4.29 PNR which carryover the visibility requirements, such that if a location was visible at 15 March 2019 then it must remain visible until the visibility list is published under rule 105(2) PNR. Rule 105 commences on 1 July 2023 and thereafter it is a requirement for the ISO to publish the initial visibility list as reasonably practicable.

- The Pilbara ISOCo strongly supports the continuation of this provision post 1 July 2023 and until such time as the visibility list is published under rule 105(2) PNR.

With regard to Proposal C dealing with minor administrative corrections with regard to Subchapter 9.3, the Pilbara ISOCo notes that rules 188A(2), 188C(a) and the note to 188B(1) contain cross referencing errors.

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

The ISO control desk requires visibility (access to certain data and information) to perform its functions under the rules including facilitating registered NSPs to achieve the system security objective.

Any reduction in visibility without due consideration may result in the ISO control desk not being able to adequately perform its functions, for example –

- Identify when a contingency or islanding event has occurred
- Identify when a network constraint may occur
- Identify when a pre-contingent action may be required
- Activate a protocol and provide a direction

This may lead to a reduction in security and reliability of the interconnected Pilbara system and therefore does not promote the 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.

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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.**

Continuation of status quo – no additional costs

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

Continuation of status quo – no additional time

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