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Energy Policy WA

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**Draft Rule Change Report: Various Pilbara ISO Functions (PRC\_2023\_01)**

We appreciate the opportunity to provide feedback on the Draft Rule Change Report: Various Pilbara ISO Functions (PRC\_2023\_01)

Alinta Energy broadly supports the additional amendments to the proposed amending rules, subject to consideration of the below issues:

Clause	Summary	Comment and recommendation
<b>274P</b>	Proposed clause 274P states that costs incurred under subchapter 9.2 or subchapter 9.3 for a Covered NSP are to be dealt with in accordance with its User Access Guide under the PNAC.	<p>Alinta Energy notes that section 42(2) of the PNAC only requires a User Access to set out the basis for determining how reasonable costs to be paid by the applicant in respect of preliminary enquiries and further investigations.</p> <p>An NSP may incur other costs in performing its functions under subchapter 9.2 or subchapter 9.3 and these costs would likely be agreed commercially.</p> <p>Alinta Considers that this clause should be amended as follows:</p> <p style="padding-left: 40px;">An NSP's costs of performing a function under Subchapter 9.2 or Subchapter 9.3, including the payment of any fee under rule 274Q 2 —</p> <p style="padding-left: 40px;">(a) for a Covered NSP — are to be dealt with in accordance with its User Access Guide under the PNAC <b>or as otherwise agreed between the parties;</b></p>
<b>274R</b>	Proposed clause 274R states that the Connection Applicant is to bear its own, and the Registered NSP's, costs of implementing, operating and maintaining costs associated with a connection (referencing the User Access Guide)	<p>Similar to the above, Alinta Energy notes that a Connection Applicant and an NSP may come to a separate commercial agreement as to how costs are to be allocated.</p> <p>Alinta Considers that this clause should be amended as follows:</p> <p style="padding-left: 40px;">Subject to rule 274R(2), <del>and</del> the User Access Guide under the PNAC, <b>or as otherwise agreed between the parties,</b> the Connection Applicant is to bear its</p>

Clause	Summary	Comment and recommendation
		own, and the Registered NSP's, costs of implementing, operating and maintaining — (a) any solution under rule 270(5) or otherwise required to achieve connection under Subchapter 9.2; and  (b) the CPC Measures for a CPC Facility.

Thank you for your consideration of our submission. If you would like to discuss further, please contact me at [oscar.carlberg@alintaenergy.com.au](mailto:oscar.carlberg@alintaenergy.com.au) or on 0409 501 570.

Yours sincerely



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