



Pilbara Networks Rules Rule Change Proposal Submission

PRC_2023_01

Various Pilbara ISO Functions

Submitted by:

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Submissions on Rule Change Proposals can be sent by:

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Post to: Coordinator of Energy
Attn: Director, Wholesale Markets
C/o: Energy Policy WA
Locked Bag 11, Cloisters Square
PERTH WA 6850

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), EPWA's Draft Rule Change Report and specifically related to the discussions at the Pilbara Advisory Committee (PAC) meeting on 25 May 2023:

ISO access and connection related costs

In the Draft Rule Change Report, the Coordinator proposes a new rule 274P where the NSP's costs of performing a function under Subchapter 9.2 (access and connection) or subchapter 9.3 (Compliance at connection point), including the payment of any fee under rule 274Q (ISO's costs):

- (a) For a Covered NSP – are to be dealt with in accordance with its User Access Guide under the PNAC; and
- (b) For a Non-Covered NSP – are to be dealt with as agreed between the NSP and the Connection applicant.

At the PAC meeting on 25 May 2023, discussion occurred as to whether it was appropriate for the ISO to recover its costs directly from the access applicants rather than through registered NSPs, as a situation might occur, particularly for non-covered networks, where a registered NSP is required to recover costs from access seekers with whom they have no commercial relationship.

ISOC Co strongly suggests retaining the concepts and drafting in proposed rule 274P(a).

The Access and Connection Procedure has been primarily drafted for access and connection to the covered networks. The Procedure clearly sets out roles and responsibilities of the ISOC Co and provides general guidance on the interaction between the registered NSP and the access applicant, see:

Attachment 1 – Feasibility Stage

Attachment 2 – Assessment Stage

Attachment 3 – Connection Stage

The ISO's engagement throughout the access and connection process is primarily with the registered NSP.

ISOC Co notes that the Access and Connection Procedure has not been drafted to specifically consider circumstances where an access seeker is seeking connection to a non-covered network or where upon energisation an access applicant becomes a registered NSP.

In those circumstances the general roles and responsibilities of the access seeker and registered NSP may need to be altered, for example to give effect to the obligations under the Harmonised Technical Rules (HTR). The draft Access and Connection Procedure requires the ISOC Co to work with the parties to agree their roles including the recovery of costs in those instances.¹

ISOC Co requests the Coordinator provides the ISOC Co flexibility through the Access and Connection Procedure for the ISO to recover costs from access applicants to a non-covered network, or where an applicant may be a registered NSP upon energisation rather than by agreement between NSPs and access applicants as currently proposed in Rule 274P(b).

Finalising interim procedures – transition period for limited ISO control desk

In the Draft Rule Change Report, the Coordinator proposes new transitional arrangements in sub-appendix 4.14. which allow interim procedures to become the permanent procedure, subject to publication and appropriate consultation undertaken by 1 January 2024. Pilbara ISOC Co strongly supports these new rules.

Discussion at the PAC meeting on 25 May 2023 related to these new transition rules, ISOC Co raised that, similar to the interim visibility requirements, a short period of transition may be required for the interim delegation agreement entered into under A4.21A between ISO and Horizon Power in respect of a limited form of the ISO control desk function.

As currently drafted, the ISO and Horizon Power will need to enter into a full delegation by 1 July 2023. The full delegation gives the ISO control desk enhanced powers, for example to act as an incident coordinator during contingency events and issue directions in accordance with the Protocol Framework Procedure.

Rule A4.57A does not have a requirement for an interim Protocol Framework Procedure (including constraint rules), and therefore Horizon Power, under its delegated ISO control desk function, has not been operating to these procedures during the interim delegation agreement period.

The short period of transition is required for the consultation and finalisation of the Protocol Framework Procedure and Constraint Rules, and to assist the delegated ISO control desk operators to implement the final products. A first round of consultation with registered NSPs on the Protocol Framework

¹ ISOC Co notes that a rule change is likely necessary to better cater for the connection of what would be two registered NSPs and their requirements under the HTR.

Procedure has occurred, with additional time being required to finalise stakeholder input. It is expected that the Constraint Rules will be released for consultation shortly.

The Pilbara ISOC Co suggests, similar to the interim visibility requirements, a short transitional period may be required to assist the ISO control desk moving from the interim delegation with limited functions under A4.21A to the full functions.

With regard to new sub-appendix 4.14, Pilbara ISOC Co also notes a reference error where Rule A4.78(a) references A4.77(c) instead of A4.77(b).

Reference Errors

As the Coordinator has proposed minor editorial changes, please find below recent reference errors identified by Pilbara ISOC Co:

Rule	Minor correction
315(1)(d)	(d) any proceedings that have been brought before the Electricity Review Board in connection with this rule 307 315(1) and the Electricity Review Board's findings and final orders in connection with those matters.
315(2)	(2) In addition to the annual report under rule 315(1), the ISO may from time to time publish a report on any one or more matters referred to in rule 315(1).
316(1)	316 Confidentiality of compliance matters (1) If the ISO determines that a notice under rule 312(6)(a)(i) or a report under rule 307 315(1) needs to contain confidential information, then —
Sub-Appendix 2.3	2.9.4 A2.9.4
Sub-Appendix 2.3	2.9.5 A2.9.5

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

ISO access and connection related costs

Proposed changes to consider recovering the ISO's cost of the application and connection process for non-covered networks be attributed to access applicants by way of the rules is aligned with a 'user pays' principle, which promotes efficient investment in, and efficient operation and use of Pilbara networks.

Finalising interim procedures – transition period for limited ISO control desk

A short transition period of the limited ISO control desk function while the Protocol Framework Procedure and Constraint Rules are being finalised will promote the system security objective.

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.

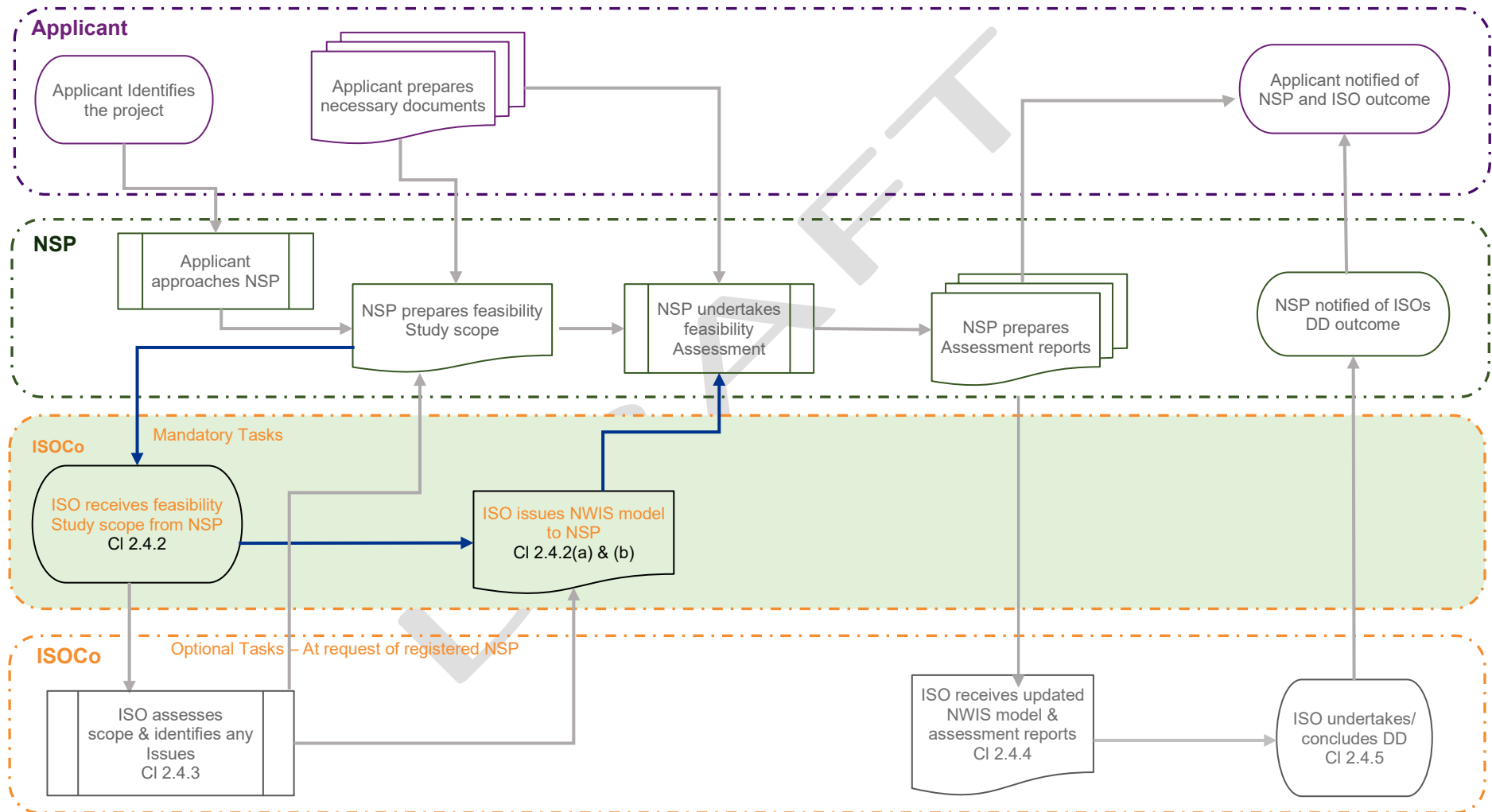
Continuation of status quo – no additional costs

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.

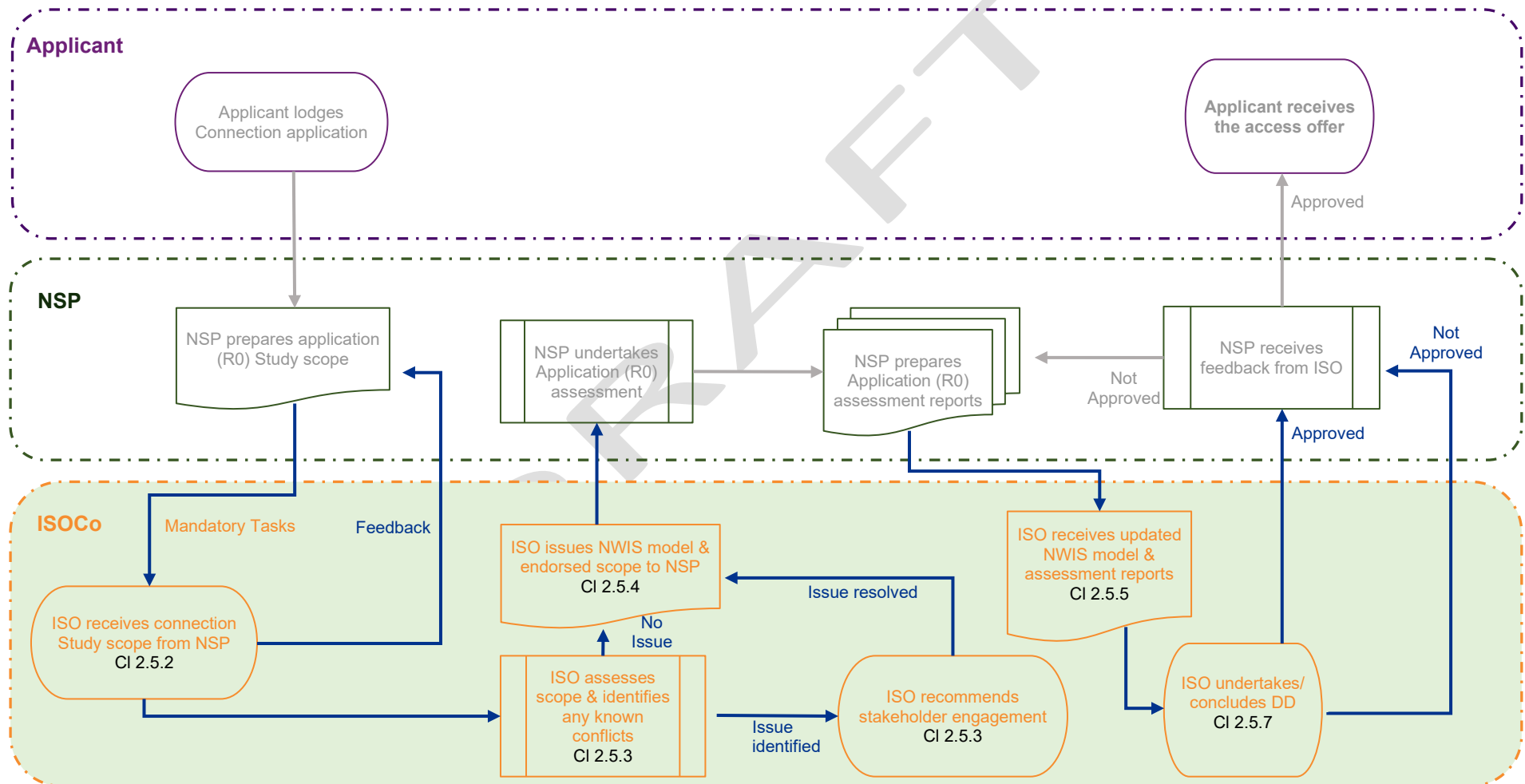
Stage 1 – Feasibility Assessment – Flowchart

The Feasibility Assessment Stage 1 flowchart is depicted below. The interactions between the applicant and the registered NSP are generally guided by the registered NSP’s User Access Guide, the representation below is generic and for context only.



Stage 2 – Application Assessment – Flowchart

The Application Assessment Stage 2 flowchart is depicted below. The interactions between the applicant and the registered NSP are guided by the registered NSP 's User Access Guide, the representation below is generic and for context only.



Stage 3 – Connection Assessment – Flowchart

The Connection Assessment Stage 3 flowchart is depicted below. The interactions between the applicant and the registered NSP are generally guided by the registered NSP’s User Access Guide, the representation below is generic and for context only.

