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Proposed Changes to the Pilbara, GSI and ESM Regulations – Consultation Paper

Thank you for the opportunity to provide feedback on the proposed changes to the Pilbara, GSI and ESM Regulations. Please find below, Horizon Power's (HP) feedback on the following proposed changes.

Reintroduction of temporary rule-making powers to the Pilbara and GSI Regulations for the Minister
HP's understanding is that this proposed change is to facilitate future changes that emerge from the evolution of the Pilbara Network Rules Project as stated in the consultation paper.

HP questions the need for temporary Ministerial rule-making powers for this purpose as there is an existing process (which allows for public consultation) prior to rule changes to the Pilbara Network Rules (PNR). Furthermore, this Ministerial rule making power has not been discussed at EPNR Working Group meetings.

HP seeks further clarification on how this Ministerial power may be used and asks that the feedback from all stakeholders (in the Northwest Interconnected System (NWIS)) in terms of implementation and costs of changes that will potentially be proposed, is considered.

Civil Penalty Framework

HP notes that these additional changes relate to the Southwest Interconnected System (SWIS) and AEMO. Accordingly, HP has no comment on this.

Amendments to the immunity provisions in the ESM Regulations

HP has no comment on this matter.

Yours sincerely,

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