

Our ref: ID60-425842108-56368

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7 August 2025

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Submitted via email: energymarkets@deed.wa.gov.au

Western Power's Submission to the Power System Security and Reliability (PSSR) Standards Review Consultation Paper

Dear Dora,

Thank you for the opportunity to contribute to the Power System Security and Reliability Standards Review.

Western Power strongly supports the evolution of the PSSR frameworks and standards as a core step toward enabling Western Australia's energy transition. Enhancing the Power System Security and Reliability Standards will help ensure a more resilient and adaptable electricity system, improve the quality and reliability of supply for network customers, and facilitate greater integration of renewable technologies. These improvements are essential to achieving the State Electricity Objective and supporting the decarbonisation of the energy sector, while also strengthening the efficiency and stability of the Wholesale Electricity Market.

Western Power's submission to the Consultation Paper accompanies this letter, with a summary of key points provided below.

Network Planning Standards - Customer Outcome Standards

Western Power supports the inclusion of Customer Outcome Standards within the Network Planning Standards Framework. Our submission outlines a recommended approach and set of measures designed to enhance transparency, clarify service expectations for all customers, and sustainably address regional reliability challenges.

System Strength Framework

Western Power recommends that the Australian Energy Market Operator has overall accountability for System Strength and acknowledges that Western Power has significant responsibilities in the co-creation of the various key artefacts that will assist in ensuring the preservation of system strength as the energy transition continues. Western Power will continue in its role of undertaking system strength assessments for new customer connections as well as any network related changes.



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Western Power acknowledges that the recommendation has considered the longer-term requirements and accountabilities and will continue to support all stakeholders as we progress through the early stages of the energy transition journey.

Ride through requirements for network elements

Consistent with its position provided during the PSSR Working Groups, Western Power does not support a broad, uniform ride-through obligation for all network elements. Given the inherent redundancy in transmission and distribution networks, a targeted approach is instead recommended—applying ride-through obligations only to specialised network-connected plant. The assets, which are analogous to generators and governed by active control schemes, would benefit from tailored obligations.

Technical Rules Submission

Western Power supports the inclusion of the previously consulted Technical Rules amendments. However, we acknowledge that considerable time has passed since our original submission to the Economic Regulation Authority, and changes in context may warrant amendments to reflect the passage of time and changes to the energy landscape to ensure that a pragmatically fit-for-purpose criteria is incorporated into the Rules during the drafting phase.

Grandfathering and scheduling of effective dates

Western Power acknowledges that some proposals may lead to increased capital and operating costs during implementation, and ongoing, with impacts flowing directly to customers and stakeholders rather than through the market. To support cost certainty for Western Power and our customers, and mitigate step-change effects, Western Power requests that grandfathering provisions and effective date scheduling be considered as a priority during the drafting phase.

We would welcome the opportunity to discuss with you the recommendations outlined in this letter and our submission.

If you have any questions or need further information regarding this letter or our submission, please feel free to contact either Sabina Roshan or me.

Yours sincerely

Zahra Jabiri

Head of Regulation and Investment Assurance