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Energy Policy WA
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Via Email: energymarkets@deed.wa.gov.au

PSSR Standards Review – Proposal 20

Alinta Energy appreciates the opportunity to provide feedback on 'Proposal 20' under the PSSR Standards Review.

We provide the following recommendations for Energy Policy WA's consideration.

Avoiding duplication and complexity

To ensure clarity and reduce administrative complexity, we recommend that any provisions transferred from the Technical Rules into the ESM Rules be removed from the Technical Rules. Maintaining two parallel rule sets creates ambiguity for participants in determining their compliance obligations, particularly where minor variations or additional requirements appear after extensive duplicated content.

This duplication also imposes an unnecessary administrative burden, as both rule books would require ongoing alignment.

If superseded provisions are not removed, the ESM Rules should at least include an explicit note, stating that, in the event of any discrepancy between the Technical Rules and the ESM Rules, the ESM Rules shall prevail (like the approach adopted for GPS Rules).

Indirect implications of technical reforms on other participants

We have reviewed the proposed changes to the technical requirements on the Network Operator assuming that if they were to have flow-on implications for the technical requirements for other participants, these would be proposed as changes to the relevant obligations under the ESM Rules. If this is not the case, and there will be flow-on implications which have not been highlighted in this consultation, we would appreciate information as to the impact on other rule participants and their obligations.

Specific Feedback

PSSR Standards Review Reference	Technical Rule	Alinta Energy feedback
Review of User Control and Protection Settings. System Design and Construction Standards (6.2.6, 6.2.7)	3.2.7 and 3.2.8	We consider that this clause appears to be too broad. Facilities are already subject control and protection settings requirements under the GPS framework, and we consider that any additional requirements or reviews imposed on the generator should be consistent with the GPS framework (and not override it). For example, any additional requirements should be subject to negotiation, having regard to power system conditions and the commercial and technical feasibility of the change (3A.5.5).
Definition of Credible Contingency (4.2)	2.5	We note that this definition does not align with the WEM Rules and that the type of "Credible

		Contingency” referred to by the Technical Rules and ESM Rules respectively may be different and used for different purposes.
Aligning Protection and Disturbance Ride-Through Requirements (6.8.6)	3.5.2 and 3.5.3.2	We do not see a need to align parts of the Technical Rules that are superseded by the relevant GPS Technical Requirements in the ESM Rules, instead, for the reasons outlined above, we recommend these rules are removed.
Clarifying Acceptable Timeframes for Protection Outages (8.9)	5.4.3(d)	We note that these requirements should be consistent with the Outage Planning rules, including the requirements to notify, negotiate with and minimise the impact on Market Participants.

Thank you for your consideration of our submission.

Yours sincerely

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