

Meeting Agenda

Meeting Title:	Pilbara Advisory Committee (PAC)
Date:	Thursday 4 December 2025
Time:	1:30 PM – 3:30 PM
Location:	Online via TEAMS

Item	Item	Responsibility	Type	Duration
1	Welcome and Agenda <ul style="list-style-type: none"> Conflicts of interest Competition law statement 	Chair	Noting	2 min
2	Meeting Apologies/Attendance	Chair	Noting	1 min
3	Minutes			
	(a) Minutes of Meeting 2025_08_28 <u>Published 9 October 2025</u>	Chair	Noting	2 min
4	Action Items	Chair	Noting	1 min
5	EPNR Project: Discussion on draft Implementation Plan submissions and responses	WG Chair	Discussion	115 min
6	PAC Meeting Schedule for 2026	Chair	Discussion	5 min
7	General Business	Chair	Discussion	4 min
	Next meeting: TBC – Proposed for 26 February 2026 at 1:30pm			

Please note, this meeting will be recorded.

Competition and Consumer Law Obligations

Members of the PAC (**Members**) note their obligations under the *Competition and Consumer Act 2010* (**CCA**).

If a Member has a concern regarding the competition law implications of any issue being discussed at any meeting, please bring the matter to the immediate attention of the Chairperson.

Part IV of the CCA (titled “Restrictive Trade Practices”) contains several prohibitions (rules) targeting anti-competitive conduct. These include:

- (a) **cartel conduct**: cartel conduct is an arrangement or understanding between competitors to fix prices; restrict the supply or acquisition of goods or services by parties to the arrangement; allocate customers or territories; and or rig bids.
- (b) **concerted practices**: a concerted practice can be conceived of as involving cooperation between competitors which has the purpose, effect or likely effect of substantially lessening competition, in particular, sharing Competitively Sensitive Information with competitors such as future pricing intentions and this end:
 - a concerted practice, according to the ACCC, involves a lower threshold between parties than a contract arrangement or understanding; and accordingly; and
 - a forum like the PAC is capable being a place where such cooperation could occur.
- (c) **anti-competitive contracts, arrangements understandings**: any contract, arrangement or understanding which has the purpose, effect or likely effect of substantially lessening competition.
- (d) **anti-competitive conduct (market power)**: any conduct by a company with market power which has the purpose, effect or likely effect of substantially lessening competition.
- (e) **collective boycotts**: where a group of competitors agree not to acquire goods or services from, or not to supply goods or services to, a business with whom the group is negotiating, unless the business accepts the terms and conditions offered by the group.

A contravention of the CCA could result in a significant fine (up to \$500,000 for individuals and more than \$10 million for companies). Cartel conduct may also result in criminal sanctions, including gaol terms for individuals.

Sensitive Information means and includes:

- (a) commercially sensitive information belonging to a Member’s organisation or business (in this document such bodies are referred to as an Industry Stakeholder); and
- (b) information which, if disclosed, would breach an Industry Stakeholder’s obligations of confidence to third parties, be against laws or regulations (including competition laws), would waive legal professional privilege, or cause unreasonable prejudice to the Coordinator of Energy or the State of Western Australia).

Guiding Principle – what not to discuss

In any circumstance in which Industry Stakeholders are or are likely to be in competition with one another a Member must not discuss or exchange with any of the other Members information that is not otherwise in the public domain about commercially sensitive matters, including without limitation the following:

- (a) the rates or prices (including any discounts or rebates) for the goods produced or the services produced by the Industry Stakeholders that are paid by or offered to third parties;
- (b) the confidential details regarding a customer or supplier of an Industry Stakeholder;
- (c) any strategies employed by an Industry Stakeholder to further any business that is or is likely to be in competition with a business of another Industry Stakeholder, (including, without limitation, any strategy related to an Industry Stakeholder’s approach to bilateral contracting or bidding in the energy or ancillary/essential system services markets);
- (d) the prices paid or offered to be paid (including any aspects of a transaction) by an Industry Stakeholder to acquire goods or services from third parties; and
- (e) the confidential particulars of a third party supplier of goods or services to an Industry Stakeholder, including any circumstances in which an Industry Stakeholder has refused to or would refuse to acquire goods or services from a third party supplier or class of third party supplier.

Compliance Procedures for Meetings

If any of the matters listed above is raised for discussion, or information is sought to be exchanged in relation to the matter, the relevant Member must object to the matter being discussed. If, despite the objection, discussion of the relevant matter continues, then the relevant Member should advise the Chairperson and cease participation in the meeting/discussion and the relevant events must be recorded in the minutes for the meeting, including the time at which the relevant Member ceased to participate.



Agenda Item 4: PAC Action Items

Pilbara Advisory Committee (PAC) Meeting 2025_12_04

Shaded	Shaded action items are actions that have been completed since the last PAC meeting. Updates from last PAC meeting provided for information in RED .
Unshaded	Unshaded action items are still being progressed.

Item	Action	Responsibility	Meeting Arising	Status
5/2025	Continually review the appropriateness of planned activities and timings, and update the PAC on progress regularly.	EPWA	2025_08_28	Closed This action has been embedded in the EPNR Implementation Plan.

Note. Closed action items will be removed from this list once noted at a PAC meeting. Accordingly, the numbering of action items may not be sequential.

Agenda Item 5: Evolution of the Pilbara Networks Rules (EPNR) Project: Discussion on draft Implementation Plan submissions and responses

Pilbara Advisory Committee (PAC) Meeting 2025_12_04

1. Purpose

The purpose of this agenda item is to:

- update the PAC on stakeholder submissions on the EPNR Project Consultation Paper on the Draft Implementation Plan (“Consultation Paper”); and
- discuss submission suggestions and proposed changes to the draft implementation plan with PAC members.

2. Recommendation

That the PAC:

- (1) notes the information provided in the PAC Presentation Slides (**Attachment 1**); and
- (2) provides feedback on EPWA’s proposed changes to the draft implementation plan.

3. Background

- On 28 August 2025, EPWA consulted with the PAC on the draft Implementation Plan.
- On 13 October 2025, EPWA published the draft Implementation Plan in the Consultation Paper and invited written submissions from stakeholders. The extended submission period closed on 6 November 2025 at 5:00pm.
- EPWA received 12 submissions from stakeholders, which included 3 confidential submissions. Public submissions are available online.
- EPWA has prepared initial responses summarising and addressing stakeholder feedback organised in four categories:
 - implementation actions;
 - implementation responsibilities;
 - implementation timings; and
 - implementation triggers.
- EPWA is not seeking further feedback on the proposed outcomes of the review or the detailed design to implement those as this will be the subject of the work programme commencing next year.

4. Next Steps

- The Implementation Plan will be published, pending Government approvals. Summary and responses to consultation papers will be published alongside the Implementation Plan.
- In the interim, prioritised actions on the governance of the Pilbara ISO, ISO fee allocation and implementation of the HTR proposed outcomes will continue to be progressed.
- Other actions, identified in the draft Implementation Plan as commencing in Q4 2025 will be deferred to Q1 2026, pending approval of the Implementation Plan.

5. Attachments

(1) 4 December 2025 - PAC Presentation Slides



Department of
Energy and Economic
Diversification

Energy Policy WA

EPNR Draft Implementation Plan

Stakeholder Submission Responses

4 December 2025

Working together for a
brighter energy future.

Contents

No.	Item	Duration
1	Introduction	5 min
2	Stakeholder submissions: Implementation Activities	40 min
3	Stakeholder submissions: Implementation Responsibilities	10 min
4	Stakeholder submissions: Implementation Timing	15 min
5	Stakeholder submissions: Implementation Triggers	20 min
6	Next Steps	5 min

Purpose of this session

This presentation summarises responses to consultation on the draft EPNR implementation plan. The presentation covers possible changes to implementation:

- Actions
- Responsibilities
- Timing, and
- Triggers.

EPWA is not seeking feedback or further inquiries on the policy design, which was consulted on earlier in the year.

This session is an opportunity for PAC members to provide comments on the submission suggestions, as EPWA prepares the final implementation plan.

Summary of Feedback

EPWA published an EPNR draft Implementation Plan on 13 October 2025. Submissions were requested on the implementation actions, responsibilities, timing, and triggers presented in the paper. EPWA received a total of **12 submissions** from:

- APA
- ATCO
- AusNet
- CME
- Horizon Power
- Pilbara ISOCo
- Rio Tinto
- Woodside
- YEC
- 3 confidential submissions

Key Submission Themes

Submissions generally agree that the right activities have been identified, and that the implementation plan has been appropriately phased.

- **Actions:** Submissions generally seek clarification and a deeper level of detail on the actions, as well as making suggestions for detailed design of various initiatives.
- **Responsibilities:** General support for the parties identified as leading each activity.
- **Timings:** Several submissions raise concerns that the timeframe presented is ambitious. Some ask for particular activities to be prioritised (particularly those that will inform new parties looking to connect), others ask to consider extending the timeline. Several submissions ask to include transitional provisions for existing facilities and participants.
- **Triggers:** Submissions favoured considering a range of triggers rather than proceeding based on a single metric.

2. Implementation Activities

3.1 ISO Board

Action:

- Action 1: Finalise proposed ISO governance, including board composition, nomination & appointment process.
- Action 2: Introduce majority independent ISO board.

Suggested actions to be included in plan

- Adjust the PAC terms of reference so it can provide advice to the ISO Board.
- The PNR will require ISO board to have the skills and experience required to perform their roles.

Suggested actions not to be included in plan

- Develop a skills matrix for the board nomination process to ensure that the requisite skill requirements can be met.

The PNR will require ISO board to have the skills and experience required to perform their roles.

3.4 ESS Cost Recovery

Action:

- Action 6: Rule change to implement runway method for Contingency Reserve Raise (CRR) service cost recovery.
- Action 12: Detailed design for Regulation services cost recovery.
- Action 24: Rule changes to implement new Regulation services cost recovery method.
- Action 60: Rule changes to implement CRL cost recovery.

Suggested actions to be included in plan

- Include timing for implementation of the new cost recovery approach post rule change.

The new cost recovery approach will commence when the rule change commences.

3.8 ISO functions

Action:

- Action 11: Develop project plan to bring control desk in-house.

Suggested actions to be included in plan

- Determine how Horizon Power costs to enable transition to ISO will be recovered.

3.13 Compliance enforcement

Action:

- Action 27: Detailed design for new compliance monitoring and enforcement mechanism.

Suggested actions not to be included in plan

- The action should include details on how the ERA's compliance monitoring and enforcement function will be funded.

ERA costs will be recovered as currently, under PNR clause 126.

3.18 System strength

Action:

- Action 44: Develop fault level requirements for the NWIS.

Suggested actions to be included in plan

- Develop the framework (including roles and responsibilities) for setting minimum and maximum fault levels before developing fault level requirements.
- The action should specify that the fault level requirements are to be developed *for the regions of* the NWIS.

3.23 Individual capacity requirements

Action:

- Action 62. Detailed design for determining individual capacity requirements.
- Action 65. Rule changes to introduce individual capacity requirements.
- Action 66. Develop, consult on, and publish method for determining individual capacity requirements.
- Action 69. Commence determination of capacity requirements.
- Action 71. Review and approve individual capacity requirements.

Suggested actions to be included in plan

- Prescribe the Reliability Standard (i.e., what level of unserved energy should be used) before determining capacity requirements.

3.25 Backup capacity procurement

Action:

- Action 70: Detailed design of backup capacity procurement.

Suggested actions to be included in plan

- Develop procedure on method for determining the expected value of customer reliability.
- Require ISO to publish the procedure on expected value of customer reliability.

3. Implementation responsibilities

3.6 Storage participation

Action:

- Action 28: Development of technical standards for storage.

Suggested change to responsibility to be included in plan

- EPWA rather than the ISO should be responsible for developing the technical standards for storage.

Technical standards for storage will be introduced through amendments to the HTR.

3.18 System strength

Action:

- Action 44: Develop fault level requirements for the NWIS.

Suggested change to responsibility to be included in plan

- The ISO should be responsible for developing the fault level requirements for the NWIS, with support provided by the NSPs.

4. Implementation timing

Overview of timing

Several submissions included suggestions for changes to activity timing, which did not always align.

Activity timing must balance a range of factors, including:

- Progressing the Pilbara objectives, including maintaining power system security and reliability.
- The time and effort involved in carrying out each activity.
- The bandwidth of NSPs, participants, the ISO and EPWA to carry out activities.
- The need for proper consultation on detailed design of reforms.

3.1 ISO Board

Action		Timing	Suggested change
1	Finalise proposed ISO governance, including board composition, nomination & appointment process.	Q4 2025	<ul style="list-style-type: none">Activities in Action 2 cannot be completed at the same time with the nomination and appointment process. Action 2 should follow Action 1 with a quarter between completion dates. <p>EPWA is considering this. Action 1 relates to long-term governance arrangements, and it may be possible to carry out action 2 ahead of action 1, with action 1 being completed in Q1 2026.</p>
2	Introduce majority independent ISO board.	Q4 2025	

3.2 HTR Standards

	Action	Timing	Suggested change
3	Rule changes to implement the PAC HTR working group recommendations to complete default standard.	Q4 2025	<ul style="list-style-type: none">Extend timing to Q1 2026, to allow public consultation on amending rules. Timing will be adjusted to Q1 2026. EPWA now expects draft rule changes to be with the working group in January, and out for public consultation in February.
9	Network Services Providers (NSPs) to retire their technical standards, to ensure that the HTR is the common set of technical standards for access and connection in the NWIS.	Q1 2026	<ul style="list-style-type: none">Extend timing to Q3 2026 to ensure smooth transition. Timing will be adjusted to Q3 2026.

3.10 Outage coordination and timing

Action		Timing	Suggested change
15	Develop and consult on outage coordination process, including risk framework.	Q4 2025 – Q2 2026	<ul style="list-style-type: none"> Developing outage coordination process (Action 15) and mitigating outage impacts (Action 17) should follow development of the new ESS procurement procedure (activity 13) and Regulation Services cost recovery (activity 12) rather than be coincident since there is a dependency between the outage coordination process and the ESS framework and ESS cost recovery. <p>EPWA does not see a dependency. ESS procurement should cover forced outages, not planned outages. Impact on ESS must be considered in planned outage assessment.</p>
16	Develop criteria for outage equipment list.	Q4 2025 – Q2 2026	
17	Develop procedure to help participants identify outage impacts.	Q4 2025 – Q2 2026	
33	Rule changes to introduce outage coordination by ISO.	Q4 2026	

3.18 System strength

Action		Timing	Suggested change
44	Develop fault level requirements for the NWIS.	Q1 2027 – Q3 2027	<ul style="list-style-type: none">• This activity needs to be brought forward since the requirements will inform new connections, as well as support new transmission infrastructure. <p>This activity will be brought forward, even recognising the large volume of work that is required in the short to medium term.</p>

3.27 Compliance monitoring

	Action	Timing	Suggested change
32	Start monitoring ESS providers.	Q4 2026 (end date)	<ul style="list-style-type: none">The end dates as specified for each compliance monitoring activity should be the start dates for those activities. There should be no specific end date. <p>These actions will be adjusted as suggested.</p>
68	Develop and implement monitoring for compliance with individual capacity requirements.	Q3 2030	
80	Develop and implement monitoring of dispatch compliance.	2033	

5. Implementation triggers

3.20-3.26

The draft implementation plan suggested that the following review outcomes be considered on a triggers, and presented 'trigger options' for stakeholder feedback:

- 3.20 HTR negotiation framework
- 3.21 Demand side participation
- 3.22 Capacity forecasting
- 3.23 Individual capacity requirements
- 3.24 Capacity certification
- 3.25 Backup capacity procurement
- 3.26 Balancing and trading

Stakeholders agreed triggers were required, and suggested a range of additional triggers for EPWA consideration – outlined on the following slide.

Additional triggers

	Suggested additional trigger or change	EPWA position
1	Load growth and/or variability - more variability means greater need for central coordination.	Load (and generation) variability is currently managed through ESS, and increasing volumes and variability would result in increasing ESS costs. Network congestion will also affect ESS costs – adopt as a new trigger.
2	The level of network constraints – more congestion means greater need for central coordination.	
3	Monitoring the use of ESS in each trading interval to avoid triggers from temporary outliers.	Monitoring consistent changes in total ESS cost (price * quantity) over four consecutive quarters will capture these factors while allowing for temporary changes – new change.
4	Establishing time-based trigger conditions linked to the commencement of precedent reforms.	Timing for implementation of dependent activities does depend on the completion of precondition activities. Sometimes, lead times mean it will be necessary to start work on a dependent reform before the precondition is complete. This is a matter of policy implementation timing rather than triggers – no new trigger.
5	Triggers based on cost benefit analyses.	Costs and benefits can be assessed during detailed design, but not necessarily in a formal quantitative manner – no new trigger.

Monitoring triggers

Some submissions noted that it would be useful to specify how triggers will be monitored, proposing that EPWA:

- Add an action to prepare a trigger monitoring plan.
- Require the ISO to gather information on and report trigger metrics.

EPWA agrees, and will include these actions in the plan.

EPWA will also include a function in the PNR for the Coordinator to respond to trigger monitoring by ensuring it is in a position to start work when a trigger is projected to be hit.

6. Next Steps

Next Steps

- Publication of Implementation Plan, pending Government approval (timing TBC).
- Prioritised activities around ISO governance, fees, and HTR changes will continue.
- Other initial actions (scheduled for Q4 2025) will be deferred to Q1 2026. Further, given the time taken and the extended consultation on the plan, some activities will be adjusted to commence work in Q2 2026 rather than Q1 2026.

Agenda Item 6: Meeting Schedule for 2026

Pilbara Advisory Committee (**PAC**) Meeting 2025_12_04

1. Purpose

PAC members to consider and approve the schedule for the PAC's 2026 meetings.

2. Recommendation

That the PAC approves the proposed PAC meeting schedule for 2026.

3. Process

The PAC usually meets every eight to nine weeks, commencing in February of each year. The PAC Secretariat has developed, in consultation with the Independent Chair, the proposed schedule for the 2026 PAC meetings. Where practicable, these meetings avoid public holidays and school holidays.

The PAC is asked to consider and approve the proposed schedule for the 2026 PAC meetings.

Proposed PAC Meeting Schedule 2026

Month	Proposed PAC Meetings
February 2026	1:30pm on Thursday, 26 February 2026
April 2026	1:30pm on Thursday, 9 April 2026
May 2026	1:30pm on Thursday, 21 May 2026
July 2026	1:30pm on Thursday, 23 July 2026
September 2026	1:30pm on Thursday, 17 September 2026
November 2026	1:30pm on Thursday, 12 November 2026