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Submitted via email: [EPWA-Submissions@deed.wa.gov.au](mailto:EPWA-Submissions@deed.wa.gov.au)

**Western Power's Submission to the Consultation on Electricity System and Market Rules - Distributed Energy Resources - Roles and Technical Requirements**

Western Power appreciates the opportunity to provide feedback on the proposed amendments to the *Electricity System and Market Rules* (ESM Rules) relating to *Distributed Energy Resources – Roles and Technical Requirements*.

Western Power is broadly supportive of Energy Policy WA's proposed amendments, and Western Power proposes further minor amendments for consideration, as shown in Table 1. We consider these reforms an important milestone in strengthening the regulatory framework to support distributed energy resource (**DER**) integration, enhance system security, and enable greater customer participation in the South West Interconnected System (**SWIS**).

Western Power supports the inclusion of the DER technical standards through a Wholesale Electricity Market (**WEM**) Procedure, along with the establishment of Western Power's function as the Distribution System Operator (**DSO**) for the SWIS, in the ESM Rules. These changes represent a critical step in the regulatory pathway toward enabling full consumer asset participation in the SWIS and supports both the WA Residential Battery Rebate Scheme and the Federal Government's Cheaper Home Batteries Program, making it easier and more efficient for households to access battery storage solutions.

As the DSO for the SWIS, Western Power has played a central role in advancing the Western Australian Government's DER Roadmap and broader energy transition. Western Power has been a key partner—alongside Synergy, the Australian Energy Market Operator (**AEMO**), ARENA, and Energy Policy WA—throughout the delivery of Project Symphony, and continues to lead the development of Project Jupiter.

Western Power's continuing development of its DSO function has already delivered initial benefits to customers and the market through the development, implementation and maturation of Western Power's Network Support Services. DSO is planned to function at scale by 2028, supported by further regulatory and ESM Rules changes to facilitate technical compliance, and orchestration.



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These reforms collectively support the intent of the State Electricity Objective by fostering innovation, reliability and customer choice, while ensuring that technical and operational standards evolve in step with modern distributed technologies and market needs.

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

Yours sincerely

**Matt Veryard**

Head of Regulation and Investment Assurance

**Table 1: Summary of Western Power's comments to the Exposure Draft**

ESM Rules	Western Power comments
Clause 3.25.1(b)	<ul style="list-style-type: none"><li>Western Power preference is to transition the Technical Rules definition of Low Voltage into the ESM Rules and amend this clause to suit.</li><li>The Technical Rules definition of Low Voltage is <b><i>Any nominal voltage of 1 kV and below.</i></b></li></ul>
Clause 3.25.1(c)	<ul style="list-style-type: none"><li>Western Power requests that this clause is amended to remove the reference to <i>each</i>. Suitable alternative wording may be <b><i>has, or is intended to have, for Inverter Energy Systems in the Energy Producing System, a maximum aggregate capacity of 30 kVA.</i></b></li><li>The intent of this change is to better align the definition of a Standard Small User Facility to existing DER connections process.</li></ul>
Clause 3.25.2(a)	<ul style="list-style-type: none"><li>Western Power requests that this clause is amended to remove the reference to <i>each</i>. Suitable alternative wording may be <b><i>maximum capacity limits for Inverter Energy Systems in the Facility.</i></b></li><li>The intent of this change is to shift the focus of the WEM Procedure to documenting the aggregate rated Inverter Energy System (<b>IES</b>) capacity for the Facility, as opposed to the capacity of each IES, which provides greater flexibility for consumers and is more consistent with Western Power's intended approach.</li></ul>
Clause 3.25.2(b)	<ul style="list-style-type: none"><li>Western Power requests that this clause is amended to (i) remove <b><i>installed</i></b> and (ii) replace <b><i>generation capacity</i></b> with <b><i>generation limit</i></b>. Suitable alternative wording may be <b><i>maximum generation limit for the Facility.</i></b></li><li>The intent of this change is to improve clarity of terminology used in the WEM Procedure.</li></ul>