Meeting Agenda

Meeting Title:	Evolution of the Pilbara Networks Rules Working Group (EPNRWG)
Workstream	Workstream 1 (PNR Workstream)
Date:	Thursday 7 May 2026
Time:	9:30 AM – 11:30 AM
Location:	Online, via TEAMS

Item	Item	Responsibility	Type	Duration
1	Welcome and Agenda • Conflicts of interest • Competition Law	Chair	Noting	2 min
2	Meeting Apologies/Attendance	Chair	Noting	2 min
3	Minutes of Meeting 2026_04_16	Chair	Endorsement	1 min
4	Design of NSP to NSP connection framework • Overview of connection process • Determination as NSP or network user • Application of technical standards • Testing for NSP connections • Information and visibility • Assessing impact of material changes behind the connection point	RBP	Discussion	95 min
5	General Business	Chair	Discussion	5 min
	Next meeting: TBC			

Please note, this meeting will be recorded.

Competition and Consumer Law Obligations

Members of the PAC's Evolution of the Pilbara Networks Rules Working Group (**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 EPNRWG 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.

Department of
Energy and Economic Diversification

GOVERNMENT OF WESTERN AUSTRALIA

EPNR Working Group

7 May 2026

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2	Determination as NSP vs network user	15 min
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4	Testing for NSP connections	10 min
5	Information and visibility	15 min
6	Assessing impact of material changes behind the connection point	15 min

Design objectives

The NSP-to-NSP Connection Framework should be designed:

- to maintain Power System Security and Reliability on the NWIS;
- to be efficient in terms of timeline and effort of all parties involved; and
- provide clear guidance without unnecessary complexity.

Scope

1. Overview of connection process
2. Determination as NSP vs network user
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Stage 1: Feasibility assessment - current

During this stage, the Connection Applicant conceptualises the project and engages with the Host NSP at a high level to assess the impact of the new connection at the point of connection

Stage overview:

- Connection Applicant approaches the Host NSP.
- The Host NSP must provide the ISO with a feasibility study scope
- On receipt of the scope, the ISO must provide the current NWIS power system model
- The ISO may provide feedback on the scope; but must if requested by Host NSP
- The Host NSP develops the feasibility assessment report, and may request the ISO review of report

Stage 2 – Application assessment-current

During this stage, the Connection Applicant formally requests access from a Host NSP and preliminary access studies are completed.

Stage overview:

- The Host NSP provides the ISO with a preliminary access study scope, the scope will include connection details, design parameters and a network model.
- The ISO must review the scope and provide observations, constraints, projects of interest (committed and non-committed) and provide the current network model.
- Once the scope is agreed with the ISO, the Host NSP prepares a project specific network model and preliminary access studies report.
- The ISO reviews model and report. If the report is not approved, the ISO must provide reasons and consult with the NSP on further studies or information required. The Host NSP must update and re-submit, until ISO approval is received.

Stage 3 – Connection assessment

During this stage, the Connection Applicant constructs and undertakes performance testing prior to and after connection as appropriate.

Stage overview:

- The Host NSP provides the ISO with a detailed design access studies report and test plan.
- The ISO must review the report and plan and issue a letter detailing its findings, including if the report and plan are approved.
  - If not approved, ISO provide reasons and consult with the Host NSP on what further studies or information is required.
  - If approved, the ISO must approve energisation for the purpose of testing and commissioning only.
- Following performance testing, the Host NSP must provide the ISO with a network validation report, validated network model of the Host NSP's network, and a r.270(1) notice
- On receipt of these documents, the ISO must determine if the new connection can proceed:
  - If not approved, the ISO, Host NSP and Connection Applicant must collaborate to find a solution.
  - If approved, this is the final approval for energisation.

Stage 1 – Feasibility assessment – new NSP to NSP

Threshold question – whether NSP to NSP connection applies

- If applicant plans to connect and participate as a registered NSP, it can approach the ISO or the Host NSP.
- If the Host NSP considers that the applicant may be required to register as an NSP, it notifies the ISO.
- The ISO determines whether the application should be considered as an 'NSP to NSP' connection or a 'network user' connection.
  - In this context, an NSP is an entity that once connected, will be required to register as an NSP under the PNR as opposed to being treated as a Facility (i.e. Excluded Networks or CPC Facilities).
  - See later slides for discussion on circumstances when an NSP will be required to register as an NSP.

Connection enquiry – new NSP to NSP

- The applicant may select either:
  - The ISO conducts feasibility assessment, and asks Host NSP for comment; ISO reviews host NSP comments and issues its feasibility findings; OR
  - The Host NSP completes feasibility assessment, which is subject to ISO review and approval.

Stage 2 and 3 – new NSP to NSP

- The Connection Applicant can select whether the Host NSP is responsible for the relevant scopes and studies, or if the ISO should fulfil this function.
- Regardless, the Connection Applicant must engages with the Host NSP if electing for CPC pathway, and as part of regular stakeholder engagement
  - The Applicant can nominate and be assessed for compliance at the interconnection point (see further information in later slides on mandatory standards and negotiated standards) or compliance with the 'full set' of HTR.
- The Host NSP or ISO assesses the application based on the current NWIS model. The ISO, Connection Applicant and if applicable, Host NSP, must consult with affected NSPs during both stages.
- The Connection Applicant prepares testing plan, which must be submitted and approved by the ISO.
- ISO retains approvals outlined in Stage 2 and Stage 3 process.
- Applicant and Host NSP agree commercial terms for any services provided across the boundary between networks.

Timelines

The Access and Connection Procedure sets a target time of 20 business days for ISO activities for each of the three stages.

This functions as clock time not elapsed time, as completion of ISO and NSP tasks depends on the complexity of the connection, the level of pre-engagement, and the quality and completeness of information provided.

Are there particular activities that should or should not have firm timeframes associated?

Are there particular timeframes that should be different for NSPs vs Network Users?

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Determination as NSP vs network user

Determining whether the connection applicant is an NSP or a network user will dictate the requirements, including technical standards and applicable connection process.

The PNR and PNAC defines NSP and networks users as below:

- Network Service Provider (NSP) – a person who owns, controls, or operates (otherwise proposes to own, control, or operate) a Pilbara network or any part of a Pilbara network.
- Network User – a person who is party to a Network Access contract with an NSP; and in Connection with a Deemed Associate Arrangement, including the Registered NSP's "other business".

However, a new NSP may still require a Network Access contract with another NSP.

In this context, the inquiry is whether the NSP will be required to be a registered NSP under the PNR once connected, as opposed to a facility (i.e. an excluded network or CPC Facility).

Determination as NSP vs network user

- The ISO will have discretion to determine if an applicant will be required to register as an NSP, and accordingly if the new NSP to NSP connection process should apply.
- Two key characteristics will inform the ISO's assessment: Network use and export limits.
  - Network users may own network assets, but these must be used only by the user. If network assets are used to provide services to third parties, the NSP must be registered.
  - If the network could potentially export more than 10 MW to the NWIS, it must be registered as an NSP.

Are these the right considerations in the determination of whether an applicant will act as an NSP or is better defined as a user?

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Connection Standards for NSP interconnection

- NSP must comply with HTR (this would be the case if it was a covered network) unless it requests, and is approved for, connection point compliance at the interconnection point.
- For CPC, the PNR will be amended to outline which sections of the HTR apply (suggested list on next slide) and what connection standards and arrangements can be agreed between NSPs.
- The ISO will have a role assessing the suitability of agreed, negotiated standards and arrangements between NSPs to ensure PSSR is preserved for affected parties.
- The current CPC Facility framework requires public consultation and PAC advice on CPC Measures. What consultation with affected or interested parties will be required for networks CPC?
- A dispute mechanism will be required when NSPs can not agree negotiated standards.
  - Option: ISO ?
  - Option: Arbitration ?
- **Do stakeholders agree with suggested approach?**
- **What are stakeholder views on the dispute resolution options?**

CPC Mandatory connection standards at the connection point

Connecting NSPs must comply with critical technical standards required to maintain power system security and reliability on the NWIS. Some standards apply at the connection point to the rest of the NWIS:

- Frequency control:
  - NSPs must comply with Frequency operating standard.
  - NSPs must have an installed automatic under-frequency load shedding system in case of contingency events.
- Voltage control: NSPs must comply with voltage limits.
- Power system stability and dynamic performance
  - Network must meet the short term power system stability and dynamic performance criteria for credible system load and generation patterns.
  - Network must be compliant with the different short term voltage stability criteria.
  - Network must be compliant with the different long term voltage stability criteria.
- Flicker – NSPs must not exceed the flicker maximum level.
- Harmonics – NSPs must be able to allocate harmonic emissions limits to controllers.

Question: Do stakeholders agree, what else might apply?

CPC mandatory connection standards behind the connection point

Other standards must be met for all points on the network:

- Electromagnetic interference – NSPs must be able to respond to all electromagnetic interference complaints in a timely manner.
- Negative phase sequence voltage – NSPs must be able to remedy problems causing any connection point on its network to reach the maximum level of negative phase sequence voltage.
- Determination of power transfer limits – NSPs must be able to determine and publish power transfer limit to equipment that is part of its network.
- Assessment of power system performance – NSPs must be able to monitor the performance of the power system on an ongoing basis and ensure compliance to the system performance parameter measurement requirements.

Do stakeholders agree, what else might apply?

CPC negotiable standards and arrangements

Other aspects of the technical rules will be negotiable between NSPs and can be supported by appropriate arrangements, subject to ISO approval.

Matters that can be negotiated could include system strength, inertia and reactive power reserves.

Do stakeholders agree, what else might apply?

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Testing for new connections – current

Testing is currently part of the Stage 3 (Connection Assessment) of the Access and Connection Procedure, where:

- Host NSP prepares and submits a detailed test plan to the ISO.
- ISO provides feedback on the test plan.
- Once the test plan is approved, applicant undergoes performance testing.
- Host NSP oversees connection tests, and prepares a model validation report and a validated network model to submit to the ISO.
- The ISO determines if the connection can proceed, and if so issues notice.
- If the ISO is not satisfied, the ISO, Host NSP, and the Connection Applicant must find a solution that addresses concerns.

Proposed testing framework for NSP to NSP connections

Both new connections and existing networks seeking interconnections need to undergo testing.

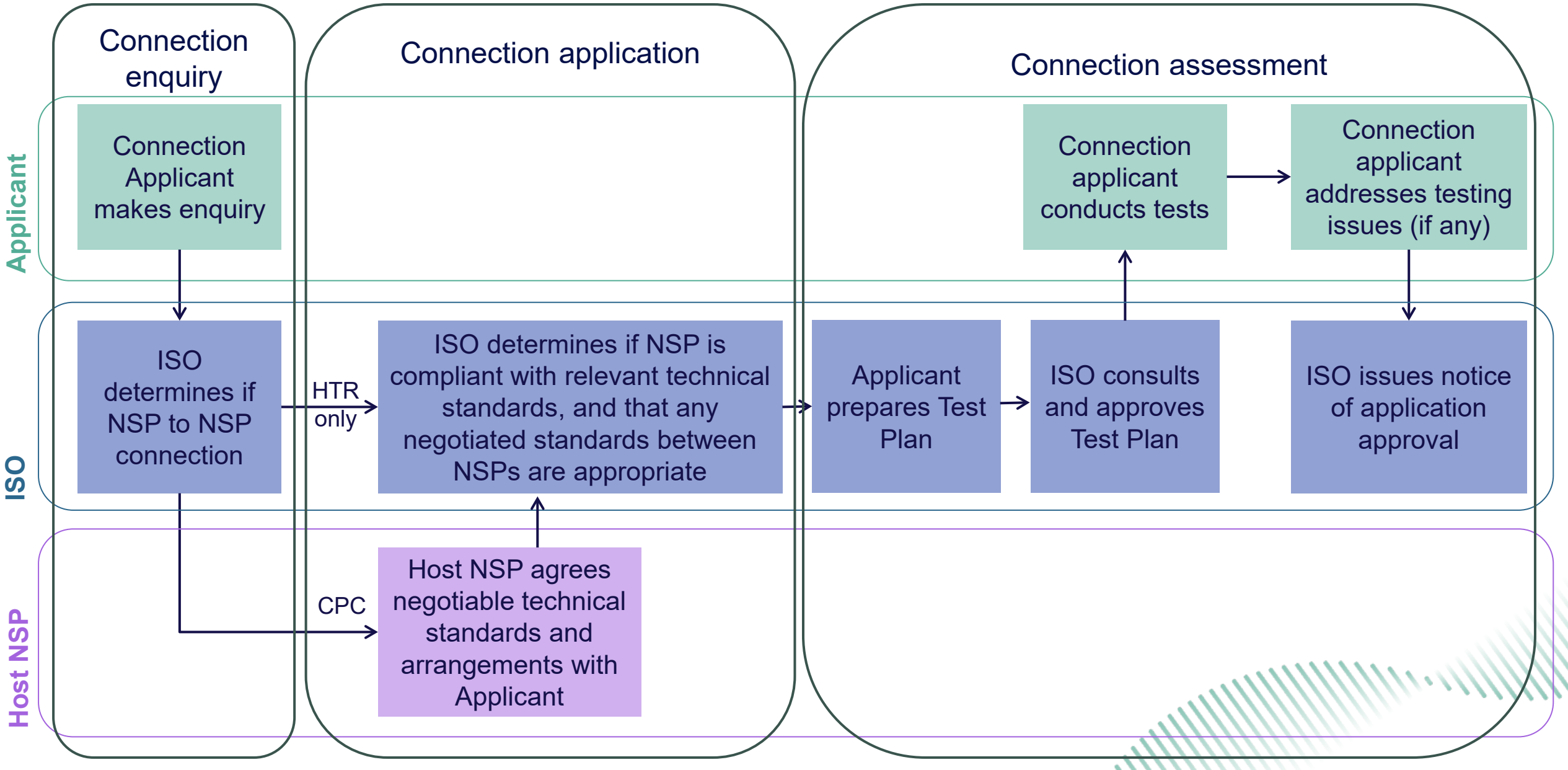
NSP testing will be managed by the ISO.

The applicant will create the proposed test plan, and the ISO will consult with affected NSPs when assessing it.

ISO will have responsibility for approving test plans.

Network user testing will continue to be managed by the Host NSP.

NSP to NSP Connections



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Information and visibility requirements

A connecting NSP must provide the ISO with:

- Power system models for the network and facilities connected to its network.
- Technical data on the network and connected facilities, including protection schemes and automatic UFLS.
- SCADA and HSR at the connection point.
- Some stakeholders have suggested that only limited visibility is required beyond the point of connection. EPWA considers that the ISO may require visibility of specific connected facilities and locations that have the potential to materially impact the PSSR of connected networks.

Would the ISO need HSR and real time SCADA data for specific connected facilities that can have a material impact on the PSSR of connected networks?

Confidentiality

All of these are subject to the confidentiality regime under the PNR and the PNAC. The same confidentiality clauses would govern any additional information request that the ISO and the Host NSP would request in relation to the connection application.

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Assessing the impact of material changes behind the connection point

CPC facilities are required to notify changes that could affect the Host NSP. The current Rules and Access Procedure defines a “potential relevant change” to a CPC facility to be a change to equipment expected to:

- Materially and adversely impact the CPC Facility’s performance against the measures used to manage non-compliant equipment.
- Require an access application or a change to a Network Access Contract; or
- Cause the equipment to cease being eligible.

For NSPs, any change that could affect another NSP, or a party connected to the network of another NSP would be material changes requiring assessment by the ISO.

The NSP must provide information showing the measures they have taken to ensure continued compliance at the connection point.

The ISO could then determine the parties with which to discuss.

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Thank-you