GOVERNMENT OF WESTERN AUSTRALIA

Department of Energy and Economic Diversification

Energy Policy WA

Evolution of the Pilbara Networks Rules (EPNR) Working Group (PNR Workstream) - Minutes

Date:	16 April 2026
Time:	9:30am – 11:30am
Location:	Microsoft Teams online

Attendees	Representing in MAC	Comment
Dora Guzeleva	Chair, Energy Policy WA (EPWA)	
Tim Robinson	Robinson Bowmaker Paul (RBP)	Presenter (Item 6)
Nathan Kirby	BHP	
Anthony Marcos Guevarra	CITIC Pacific Mining	
Glen Carruthers	Fortescue	
Ken Chong	Fortescue	
Herman Prinsloo	Horizon Power (Generation and Other Business)	
Guy Tan	Horizon Power (Pilbara Network)	
Jaden Williamson	Horizon Power (Pilbara Network)	
James Campbell-Everden	Pilbara ISOCo	
Neil Gibbney	Pilbara ISOCo	
Summa McMahon	Pilbara ISOCo	
Lewis Peaty	Pilbara ISOCo	
Noel Michelson	Rio Tinto	
Nenad Ninkov	Woodside	
Nick Bardsley	Woodside	
Reece Tonkin	Yindjibarndi Energy Corporation (YEC)	
Other attendees	**From**	**Comment**
Alistair Duffy	RBP	
Eija Samson	RBP	
James Seidelin	RBP	
Tom Coates	EPWA	
Luke Commins	EPWA	

Apologies	From	Comment
Anthony Ravi	APA	
Melinda Anderson	ERA	
Timothy Edwards	Metro Power Company	

1. WELCOME AND AGENDA

The Chair opened the meeting with an Acknowledgement of Country.

The Chair noted the Competition and Consumer Law obligations of the Working Group members, inviting them to bring to her attention any issues should they arise.

2. MEETING APOLOGIES AND ATTENDANCE

The Chair noted the attendance as listed above.

3. MINUTES OF MEETING 2025_09_31

The 31 July 2025 meeting minutes were approved out of session and published on 21 August 2025.

4. PRIORITY ACTIONS

The Chair presented Slide 5, highlighting that the activities in early 2026 will focus on enabling interconnection, and managing the entry of renewable generation and storage facilities in the NWIS

The Chair then presented Slides 6 – 8.

5. WORKING GROUP SCHEDULE

The Chair presented Slides 10 – 13.

- Mr Williamson noted that Package 0 is proceeding directly to the Rule Change process, and asked whether Working Group sessions would develop policy positions on the rest of the proposals leading to a Consultation Paper, followed by rule changes consultation.

The Chair confirmed that the rest of the proposals would be discussed by the Working Group, submitted to the Pilbara Advisory Committee (PAC), and then published as a Consultation Paper before draft rules are developed.

6. NSP TO NSP CONNECTIONS

Mr Robinson indicated that the purpose of this item was to identify issues and gather initial input on the design elements of an NSP to NSP connection framework, ahead of a second workshop.

Mr Robinson presented Slide 15.

- Mr Carruthers noted that not all listed determinants are relevant to each network classification, citing that third party service provision is not relevant to a CPC Facility.

The Chair clarified that these were key factors influencing classification and participation, and that the current CPC Facility is intended for user facilities, not Network Service Providers (NSPs) providing services to third parties.

Mr Robinson presented Slide 16.

- Mr Peaty noted that the connection process is supported by the constraints framework, with the ISO maintaining PSSR, if necessary.
- Mr Campbell-Everden noted that, in practice, the ISO and NSPs work collaboratively.

Mr Robinson acknowledged this and clarified that the statement reflects the rules as written, though deviation from ISO guidance would be unlikely.

Mr Robinson presented Slides 17 - 18.

- Mr Williamson emphasised that roles and responsibilities post-connection are critical, as they shape the connection process. He described 'three tiers' of connecting networks:
    - user networks that are self-contained, interacting with host NSP;
    - non-covered NSPs, who are responsible for compliance and interfacing directly with the ISO; and
    - covered NSPs, which are subject to greater ISO involvement, regarding user connections, the balancing regime, constrained access, etc.
- Mr Carruthers argued that the proposal would not work if all networks must comply with HTR Chapters 2 and 3, as this would inhibit connections.

The Chair explained that the proposal allows NSPs to demonstrate compliance at the connection point rather than across their entire network, and noted the current gap in defining roles and responsibilities for this arrangement.

- Mr Carruthers agreed, emphasising that interaction at the connection point is key, given differing network risk profiles and standards, and not what's within the network behind the connection point.
- Mr Carruthers added that the framework should enable connection while allowing NSPs to negotiate, rather than imposing a single set of rules.

The Chair agreed and noted the need for a mechanism to resolve disagreements.

Mr Robinson added that some number of fundamental standards would need to apply across the whole interconnected system.

- Mr Peaty highlighted the need for common compliance standards to avoid burdening compliant networks. He noted that if generators respond to a fault and one network gets away with individual generators not responding, that would burden other networks.
- Mr Peaty questioned the technical validity of CPC and suggested further assessment.
- Mr Carruthers noted similar frameworks exist internationally that focus on clear responsibilities and disconnection rules.

The Chair emphasised that the key issues include NSP responsibilities during disturbances and coordinated responses to system-wide events.

Mr Robinson presented Slide 19. He noted that, while the NEM offers useful concepts, it does not directly address the Pilbara-specific challenges.

- Mr Carruthers referenced European models, where interconnection rules are distinct and enforced at the connection point. He noted that, if either NSP cannot comply with the rules at the interconnection point, they disconnect.

- Mr Carruthers outlined a hypothetical example of two connected NSPs, in which one purchases 40 megawatts (MW) from the other. If the NSP providing the MW has a problem on its side of the connection, it must solve it. If the NSP purchasing the MW trips at the interconnection point, it must have reserves to stabilise its network.

The Chair stressed the distinction between commercial arrangements and technical standards, noting the need for a defined technical envelope. She emphasised that currently participants must meet load following requirements and maintain sufficient reserves.

- Mr Peaty questioned whether a focus on self-sufficiency limits interconnection benefits.
- Ms McMahon asked about impacts on the ESS regime, if networks can disconnect.
- Mr Carruthers clarified that disconnection would occur only under pre-agreed conditions to manage risk.
- Mr Williamson noted that networks with third-party access require greater certainty and stronger requirements for their users than single-party networks.
- Mr Tan suggested establishing overarching technical standards (e.g. frequency), with other parameters negotiated (e.g. fault levels).
- Mr Carruthers agreed, cautioning against overly prescriptive rules. He suggested that things like system strength, inertia and reactive power reserves should be managed between the two NSPs.

The Chair reiterated that the HTR ensures minimum standards at the connection point, with ISO responsible for ESS procurement. She noted the need to define which technical matters require ISO agreement or veto.

Mr Robinson asked what would happen if agreement between two NSPs can't be reached.

- Mr Carruthers stated that failure to reach agreement would result in no connection.

The Chair raised concerns about competitive incentives creating barriers and emphasised the ISO's mediation role.

- Mr Carruthers disagreed that the ISO was needed but noted his desire for the system to be looked after and the Pilbara to prosper.
- Mr Bardsley suggested NSP-to-NSP connections may require additional technical rules and a dispute mechanism involving the ISO when parties cannot agree.

The Chair had concerns about excluding the ISO from assessments, given its responsibility for system security.

- Mr Carruthers emphasised that the Pilbara networks are privately owned and segregated, unlike large publicly owned systems, and therefore require a different framework. He cited Europe as an example, where a transmission NSP can connect assets without seeking approval from other NSPs or a central ISO.

The Chair responded that, in any market, interconnections require some level of oversight. While NSPs manage their own internal operations, the interconnection process must ensure compliance with fundamental minimum standards to maintain system security and reliability.

- Mr Carruthers agreed but reiterated that the focus should be on balancing which matters require ISO oversight and which do not.

The Chair stated that this underpins the need for a minimum standard. While the HTR Workstream has addressed automatic standards, a minimum standard at the connection point remains necessary for all participants in the NWIS.

- Mr Williamson outlined that:
    - existing processes work well for user connections;
    - NSP connections require greater ISO involvement for the benefit of the incoming party; and
    - existing PNR mechanisms support resolving conflicts.
- Mr Williamson added that, if the ISO is responsible for the compliance of the new NSP once connected, the ISO should be confident that the incoming NSP is meeting all the requirements of an NSP, and not a user, before connection.

Mr Robinson emphasised that reforms aim to support efficient information sharing while allowing operational independence. He asked whether current ESS arrangements already enable this.

- Mr Peaty explained that the ISO studies the whole system and procures ESS to meet system-wide frequency standards. He noted that part of the value of interconnection is that ESS can be optimised and contracted for how much the system needs at any given time.
- Ms McMahon noted that natural system headroom exists, but ISO must still cover the largest single credible contingency.
- Mr Carruthers asked whether the ISO just looks at the contingencies on covered networks or if they look at all connected networks, such as Rio Tinto's.
- Mr Campbell-Everden answered that the ISO looks at contingencies on all interconnected networks, that form part of the NWIS, and enters into operational arrangements to ensure that the networks and systems are operated within the prescribed parameters.
- Mr Carruthers noted that, in line with Mr Robinson's point, NSPs should be able to choose whether to share resources or remain self-sufficient, observing that this would simplify some aspects of the connection process:
- Mr Carruthers considered that:
    - If a fault occurs and each NSP maintains sufficient regulation reserve, the impact is shared across networks as frequency moves across the system.
    - While efficiencies may be achieved by reducing required regulation reserve, this would require all networks to be fully compliant, with significant associated costs.
    - This transition cannot be achieved through a single rule change and will require a gradual process of integrating networks and developing the technical rules accordingly.

The Chair summarised that, in the current regime, everyone must follow their loads. However, the ISO still caters for the largest contingency on the system. She noted that ESS requirements will increase with system growth and variability, with market mechanisms are likely to be needed in future – but not yet.

Mr Robinson presented Slides 19 (continued).

- Mr Carruthers reiterated that the focus should be on compliance at the connection point as connecting HTR-compliant networks should not face barriers.

The Chair noted Mr Carruthers' comments and that further discussions on NSP-to-NSP connections should focus on non-covered networks with third-party connections that are willing to demonstrate compliance at the connection point and take full responsibility for activities behind that point.

- Mr Williamson noted that the incoming NSP should provide its network model to the ISO.

The Chair highlighted the importance of models provision, especially in the context of emerging system strength considerations, and the need for updates following material changes.

- Mr Williamson added that NSPs should notify the ISO directly of material changes, provided compliance at the connection point is maintained.

Mr Robinson presented Slides 20 – 22.

- Mr Williamson noted that ISO's visibility requires formal application and does not automatically increase with new connections.
- Ms McMahon clarified that the ISO will consult on visibility requirements for new connections and must have visibility of elements affecting security and reliability.

The Chair queried whether ISO visibility should extend beyond the connection point to major facilities connecting behind the connection point.

- Ms McMahon indicated this may be required depending on system security impacts and ESS needs.
- Mr Carruthers argued that connection point visibility is sufficient, though higher-speed data may be required.

The Chair noted evolving SCADA requirements and the need for clear data expectations to avoid connection delays.

- Mr Williamson highlighted that the ISO will need to integrate any new networks into the constrained access and balancing regimes, and queried whether or not that may be a prerequisite before energisation of the new connection.

7. GENERAL BUSINESS

The meeting closed at 11:30am.

The next meeting is scheduled for 7 May 2026.