

Meeting Agenda

Meeting Title:	Evolution of the Pilbara Networks Rules Working Group
Workstream	Workstream 2 (HTR Workstream)
Date:	Thursday 2 July 2026
Time:	2:00 PM – 4:00 PM
Location:	Online, via TEAMS

Item	Item	Responsibility	Type	Duration
1	Welcome and Agenda - Conflicts of interest - Competition Law	Chair	Noting	1 min
2	Meeting Apologies/Attendance	Chair	Noting	1 min
3	Introduction	Chair	Noting	5 min
4	Feedback on submissions: - a.) Open questions in workshop guide - b.) Grandfathering considerations in workshop guide - c.) Discussion of EPWA responses provided in workbook	RBP	Discussion	110 min
5	General Business	Chair	Discussion	3 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.

Draft HTR Amendment Rules – select stakeholder comments

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Stakeholder questions - Issue 8

Issue	8 – Review of HTR cl 3.7 (Requirements for the connection of storage)
Issue Lead	Peter (ISO)
Explanatory Note (extract)	Clause 3.7 provides for the determination of requirements by the ISO, in collaboration with the NSP, for the connection of storage facilities, defined as Storage Works in the Pilbara Networks Rules. By delegating the responsibility to determine performance requirements for storage works to the ISO, clause 3.7 does not provide for the same level of transparency, consistency, and rigour as other user facilities including large generating units (clause 3.3), small generating units (clause 3.4), LV connected inverters (clause 3.5), and loads (clause 3.6). A suite of amendments to clauses 3.3 and 3.7 are proposed to support the participation and increasing prevalence of Battery Energy Storage Systems and inverter-based generating units
HP question	What is the basis for requirement in clause 3.3.4.4(f)(1)(c) for non-synchronous generating units to achieve at least 90% of the maximum response expected according to the droop characteristics within 2 seconds of any frequency disturbance? It is likely sufficient. Worth checking in future studies.
BHP question	Given proposed clause 3.3.4.4(f)(1)(c), controller obligations in 5.2.3(e) may require clarification or upgrade. Clause 5.2.3(e) requires a controller to notify the NSP prior to a generating unit being operated in a mode where the generating unit will be unable to respond in accordance with clause 3.3.4.4.
Anon question	Drafting changes include reference to 'hydro generating units'. Is this necessary, or can it be removed?
Workshop outcomes	

Stakeholder question - Issues 10 and 11

Issue	10 and 11 – Inverter Dynamic Performance
Issue Lead	Njabulo (BHP)
Explanatory Note (extract)	New definitions for ‘disturbance stability’ ‘generating system’ and ‘non-synchronous generating unit’ have been introduced to clause 1.5. The definition of ‘small disturbance rotor angle stability’ has been removed. The definition of transient stability in clauses 2.2.7 and 2.2.8 have been amended to be technology agnostic in their application. Clauses 2.2.8(a) – (c) have been removed and replaced with Table 2.8, outlining the disturbance stability criteria for small and large disturbances respectively. Clauses 3.3.1(d) and subclause (1) have been amended to align them with changes to clauses 2.2.7 and 2.2.8. Clauses 3.3.1(i) has been introduced to require all generating systems to ensure their connection does not degrade power system dampening. Clause 3.3.3.3(f) has been introduced to amend the conditions under which power stations with non-synchronous generating units may absorb reactive power after disturbances in the power system.
APA request	APA requests discussion on a damping method at an upcoming working group meeting
Workshop outcomes	

Stakeholder question - Issue 28

Issue	28 – Review of fault level management on the system
Issue Lead	David (HP) and Peter (ISO)
Explanatory Note (extract)	The HTR Working Group undertook a high-level review of fault level requirements and fault level management in the Harmonised Technical Rules considering: • minimum fault rating requirements for Transmission plant at significant network nodes; and • potential requirements for limitations on maximum fault levels on the system and guidance on the calculation of fault levels. After this review, the working group determined updates to the HTR were required. Amendments to clause 3.2.1, including Tables 3.1 and 3.2, specify the minimum Short Time Withstand Current and Short Circuit Breaking Current for new equipment on transmission and distribution networks.
Anon request	Table 3.2 sets minimum short time withstand and breaking current ratings for distribution equipment. The submission requests that the table adopt higher, more conservative minimum ratings to support future fault-level growth and site expansion (increased load and new generation). Equipment ratings can be negotiated with the NSP when fault-level calculations demonstrate materially lower prospective fault levels at the installation point.
Workshop outcomes	

Stakeholder questions - Issue 32

Issue	32 – Update CFCTs to reflect system changes and approved derogations
Issue Lead	Peter (ISO)
Explanatory Note (extract)	Table 2.10 has been amended to update Critical Fault Clearing Times in the NWIS, to align with other technical rules and reflect the findings of an independent study not captured during the development of the HTR. Practically, this means removing HP-Rio tie lines so that Table 2.10 lists the maximum Total Fault Clearance Times for systems that are 33kV (or below) as 300ms. News clauses 2.6.4(h) and (i) have been added to allow alternate Total Fault Clearance Times. Clause 2.6.4(h) will allow for slower clearance times with the agreement of the ISO, and clause 2.6.4(i) allows NSPs to require the clearance time for primary equipment to be reduced to the required maximum total fault clearance time in Table 2.10 with the agreement of the ISO.
BHP question	With reference to clause 2.6.4(i), while the NSP/ISO may agree to a higher clearance time based on network conditions, they should also have the ability to require the clearance time to be reduced to the required levels in table 2.10 should network conditions change.
BHP question	We note that the alternative maximum total fault clearance time for 66kV in table 2.11 is lower (105) than the value for the maximum total fault clearance time for 66kV in table 2.10 (120). Query on what the rationale is for this?
Workshop outcomes	

Stakeholder questions - Issue 35

Issue	28 – Special Protection Schemes
Issue Lead	Njabulo (BHP)
Explanatory Note (extract)	New definitions of ‘Non-credible Contingency Event’, ‘Protected Event’ and ‘Special Protected Scheme’ have been introduced to clause 8 of the PNR and clause 1.5 of the HTR. Rule 198A has been introduced outlining when the ISO may determine that a non-credible contingency event should be treated as a Protected Event and the requirements for an NSP to respond, whether by implementing a Special Protection Scheme, providing an alternative method of response, or why no action is necessary. Clauses 2.2.1(d) and 2.2.1(e) have been amended to account for the new defined term non-credible contingency event and correctly align with the style of the rest of the HTR. New clause 2.3.10 is introduced to outline how special protection schemes will operate and be maintained. New clause 4.1.8 is introduced to outline how special protection schemes, and the relevant facilities and equipment, will be tested by the relevant NSPs.
BHP suggestion	With reference to Rule 198A(3), BHP note that the ISO can identify the need for a Special Protection Scheme, but that ultimately the NSP can choose to pursue the investment or disagree (outlining why no further action is required). We suggest that the ISO make the final determination based on feedback from the NSP
APA question	The note on Rule 198A(2)(d) indicates the design of the scheme should look to avoid the use of ESS, constraint rules or manual load shedding measures where feasible. If these measures are available and can be adjusted to avoid the situation, should these not be considered?
Anon question	The note on Rule 198A(2)(d) refers to avoiding “manual load shedding” measures where feasible, but does not address automatic schemes such as UFLS and UFIS. The submission requests clarification on whether UFLS/UFIS are intended to be treated as a Special Protection Scheme under the proposed SPS/Protected Events framework, and if so, what governance, documentation, testing and reporting obligations would apply to these existing schemes.
Workshop outcomes	

Stakeholder comments raising grandfathering/transitional provision considerations

Stakeholder feedback queried whether grandfathering or transitional provisions were required for the following items:

Proposal / item	Proposed/affected HTR clauses
8 – Requirements for storage works	• Clauses 3.3.3.3(a) is amended so that, for the purposes of the connection of storage works, the requirements for generating units responding to power system disturbances also apply to storage works. • Similar changes to clause 3.3.3.4 will mean the requirement of a generating unit to be capable of a sudden reduction in active power will also apply to storage works. • Similar changes to clause 3.3.4.5 will apply the technical rules for a unit's voltage control system to storage works. • Similar changes to clause 3.3.3.5(a) apply ramping rate limits to storage works. • Amendments to clause 3.3.4.4(a) expand automatic variable speed control requirements to all generating unit control systems, not just turbine control systems. Amendments to clause 3.3.4.4(e) expand the applicability of rules on control range for dispatchable generating units to all generating units, not just synchronous generating units. Both changes will make those rules applicable to generating units that are storage works. • Clause 3.3.4.4(f)(1) is amended so that non-synchronous generating units are covered by rules establishing a rate of response under frequency control provisions. • The current clause 3.7 states the Harmonised Technical Rules apply to a storage facility as a generating unit in respect its injections only. Amendments to clause 3.7 allow that storage works may be treated as a generating unit at all times.
23/I2025.02 – Changes to Figure 3.3. and to the reactive power capability of inverter-based generating units to ensure HTR requirements are technology agnostic	• Clauses 3.3.3.1(c)(1) – (5), Clause 3.3.3.1(d) and Figures 3.1, 3.2 and 3.3 have been amended to create a standardised, technology agnostic approach to the reactive power capabilities of generating units, as well as cater for the ability of storage works to absorb reactive power.
26 – Monitoring and control requirements	• Existing clause 3.4.9 is amended to extend remote control, monitoring units and communication requirements to all generators, removing the exception for generating units exporting below 1 MW. • Clause 3.5.2 is amended to specify remote control, monitoring and communication requirements for inverter coupled generating units (up to 1000KVA).
28 – Review of fault level management on the system	• Amendments to clause 3.2.1, including Tables 3.1 and 3.2, specify the minimum Short Time Withstand Current and Short Circuit Breaking Current for new equipment on transmission and distribution networks.

Grandfathering (Appendix 3 of the PNR)

- Per Appendix 3, there are legacy arrangements for existing and committed facilities at the HTR's Application Date, who instead comply with Previous Standards.
 - Loss of legacy arrangements after major works ("a relevant modification")
 - A modification is 'a relevant modification' if "(a) the ISO determines that the modification gives the Facility's Controller a reasonable opportunity in accordance with GEIP, at reasonable additional cost, to concurrently remedy or mitigate any non-compliance by the Facility with the Harmonised Technical Rules; and (b) the ISO gives a notice to the Facility's Controller of that determination."
 - Withdrawal of legacy arrangements for Security or Reliability reasons
 - Per ISO determination and notice to affected controller.
 - Cost of compliance upgrades is to be borne by the Facility's Controller.

ISO Exemption from the Rules (Rule 57)

- 57 ISO may grant an exemption from these Rules
- (1) A person (in this rule 57, the **"Applicant"**) may apply to the ISO for an exemption from one or more requirements of these Rules.
 - (2) A proposed exemption may be expressed —
 - (a) to apply to specified person, persons or class of persons, in respect of a specified Network, networks or class of networks; and
 - (b) to apply for a specified period or indefinitely, including to give a person time to comply with a rule; and
 - (c) to be unconditional, or to be subject to conditions; and
 - (d) apply to one or more persons.
 - (3) If the Applicant is not a Registered NSP, the ISO must give a copy of the application to, and must consult with, each Registered NSP in the Power System.

NSP may grant an exemption from the HTR (Rule 64)

- 64 NSP may grant an exemption from the Harmonised Technical Rules
- (1) A Network User, Access Applicant or Controller (in this rule 64, the **"Applicant"**) may apply to a Registered NSP for an exemption from one or more requirements of the Harmonised Technical Rules.
 - (2) An application for an exemption must include reasonable supporting information.
- ...
- (6) When consulted under rule 64(4)(c), the ISO must as soon as practicable, and in any event within 4 weeks of the consultation commencing, determine, and advise the Registered NSP —
 - (a) whether the exemption is or is not likely to cause or contribute to any adverse impact on Security, Reliability or the Pilbara Electricity Objective; and
 - (b) whether the exemption is or is not consistent with the constrained access regime in Subchapter 9.1; and
 - (c) of any conditions the ISO recommends be placed on the exemption.
 - (7) The Registered NSP must as soon as practicable, and in any event within 4 weeks after receiving the ISO's advice, determine the application —
 - (a) to a GEIP standard; and
 - (b) having regard to the ISO's advice if applicable; and

- (c) having regard to the effect the proposed exemption will, if granted, have on the Registered NSPs and Network Users of its Network and any Network in the Power System, and must grant the exemption if it determines that in all the circumstances the disadvantages of requiring the Applicant to comply with the requirement are likely to exceed the advantages.
- (8) An exemption under this rule 64 —
 - (a) may be granted for a specified period or indefinitely; and
 - (b) may be transitional in nature and may include provisions allowing a person time to comply with the Harmonised Technical Rules; and
 - (c) may be unconditional, or may be subject to any reasonable conditions the Registered NSP considers fit, in which case the person granted the exemption must comply with the conditions.