

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

Date:	18 June 2026
Time:	9:30am – 11:30am
Location:	Microsoft Teams online

Attendees	Representing in Working Group	Comment
Dora Guzeleva	Chair, Energy Policy WA (EPWA)	
Tim Robinson	Robinson Bowmaker Paul (RBP)	Presenter Items 5 - 7
Lizzie O'Brien	APA	
Liz Gharghori	APA	
Shane Potter	APA	
Anthony Marcos Guevarra	CITIC Pacific Mining	
Melinda Anderson	ERA	
Glen Carruthers	Fortescue	
Ken Chong	Fortescue	
Guy Tan	Horizon Power (Pilbara Network)	
Jaden Williamson	Horizon Power (Pilbara Network)	
Sandy Morgan	Horizon Power (Generation and Other Business)	
Timothy Edwards	Metro Power Company	
Steve Kenny	Horizon Power	
Neil Gibbney	Pilbara ISOC	
Summa McMahon	Pilbara ISOC	
Lewis Peaty	Pilbara ISOC	
Peter Van Den Dolder	Pilbara ISOC	
Noel Michelson	Rio Tinto	
Lathin Thomas	Rio Tinto	
Li-Lin Ang	Rio Tinto	
Matthew Kok	Rio Tinto	
Nenad Ninkov	Woodside	
Reece Tonkin	Yindjibarndi Energy Corporation (YEC)	

Alistair Duffy	RBP	
Tom Coates	EPWA	
Luke Commins	EPWA	
Apologies	From	Comment
Nick Bardsley	Woodside	

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 and invited them to bring any issues to her attention.

2. MEETING APOLOGIES AND ATTENDANCE

The Chair noted the attendance as listed above.

3. MINUTES OF MEETING 2026_05_07

The draft Minutes of the 7 May 2026 Working Group Meeting were provided to members for review on 12 June 2026 and were published on 18 June 2026.

4. PNR ENTITY TAXONOMY

Mr Robinson presented Slides 4 - 9.

- Members discussed the use of “commercial feasibility” (Slide 3) as a regulatory objective. Several members also noted that the Pilbara Networks Access Code (PNAC) refers to actions being undertaken in the most efficient manner.

The Chair suggested adjusting the objective to replace “commercially feasible” with, “to be efficient in terms of timeline and effort, without imposing undue cost burdens on the parties involved.”

- Referring to the additional drivers for the proposed entity taxonomy, Ms O’Brien asked what was meant by reducing the conflation of physical facility attributes with compliance obligations.

The Chair explained that the current taxonomy conflates physical equipment with the party responsible for compliance. The revised taxonomy would clearly distinguish between the two.

- Referring to the stated commitment not to materially change CPC Facility scope (Slide 5), Mr Chong asked whether the existing CPC definition would remain unchanged while broadening the circumstances that CPC was available.

The Chair confirmed that the existing CPC Facility concept would remain, with separate rules applying to NSPs.

- Ms O’Brien noted that covered and non-covered networks are already recognised registration categories under the Rules and suggested categorising networks according to their compliance obligations.
- Ms Morgan supported simplifying the Rules but noted that categorising networks in this way would require extensive amendments throughout the Rules, making the amendment process more difficult.

Mr Robinson advised that this approach had not previously been considered but agreed that the key objective is to clearly identify when and how the Rules apply.

- Mr Carruthers questioned the use of “either” when referring to different Facility types, noting that a Facility should be able to operate as both a load and a generator if it meets the relevant requirements.

Mr Robinson agreed, noting that a distinction would remain between Facilities that export and those that only import. Consumer Facilities would remain subject to the existing requirements, while Facilities exporting energy would be subject to additional obligations.

The Chair added that storage withdraws and injects energy, but it must register as an Energy Producing Facility, rather than as a Consumer Facility. She noted that some confusion arises from referring to storage as a Consumer Facility.

- Ms McMahon asked in what circumstances an ESS Facility would not also be registered as an Energy Producing Facility or Consumer Facility.
- Mr Duffy gave the example of an ESS Facility in an Integrated Mining Network or Non-Covered Network, which would be required to register as an ESS Facility but not as a registered Energy Producing Facility.
- Mr Van Den Dolder asked what benefit was provided by introducing an ESS Facility as a Facility Class, noting that ESS Provider is already used for outage and system coordination.

Mr Robinson explained that recognising ESS Facilities would allow them to be prioritised during contingency events before other Facilities and would introduce additional information requirements beyond those applying to Energy Producing Facilities.

- Mr Peaty observed that Registered Energy Producing Facilities and Registered Consumer Facilities are registration classes, whereas ESS Facilities and CPC Facilities are classifications that may apply across either category.

Mr Robinson agreed with that and asked whether the proposal addressed practical issues members experience when applying the Rules.

- Mr Peaty considered that the proposal is a good foundation but noted that the introduction of substantial new terminology should be refined over time.
- Mr Gibbney noted that under the current Rules, a CPC Facility is treated as either a Consumer Facility, Generating Facility or Storage Works, and questioned why this approach needed to change.

The Chair explained that under the current Rules, a CPC Facility is treated as a Consumer Facility when only importing and as an Energy Producing Facility when exporting.

- Ms O'Brien observed that the proposal introduces substantial new terminology and registration classes and suggested restating the problem the proposal seeks to address, so that members could better assess the proposed changes.

The Chair explained that the objective is to ensure that the Rules can accommodate emerging technologies, such as renewable generation, hybrid facilities and flexible loads, as well as new business models and NSP-to-NSP interconnections.

Mr Robinson added that the proposal arose from the difficulty of incorporating Energy Producing Facilities into the current Rules. This highlighted the need to reorganise the underlying concepts so that technologies such as storage can be more readily accommodated.

- Mr Gibbney noted that, in the ESM Rules, the term “Energy Producing System” is primarily used for settlement and balancing purposes, whereas the PNR are principally concerned with power system security and reliability. He questioned whether introducing the terminology was necessary.

Mr Robinson explained that numerous provisions currently refer only to Generating Facilities and therefore require amendment so that storage can be treated consistently before introducing technology-specific technical requirements.

The Chair added that the technical rules are already evolving in response to inverter-based resources, including both grid-following or grid-forming technologies, making it necessary to address storage within the Rules.

- Mr Gibbney noted that existing storage connected to the NWIS is already treated as generation when exporting and as load when charging.
- Ms Morgan and Ms O’Brien supported preparing a paper summarising the proposed terminology and its impacts throughout the Rules.

The Chair reiterated that the proposal seeks to reduce complexity by introducing consistent terminology that can apply across generating units and Storage Works, avoiding the need to repeatedly specify to which requirements apply.

- Mr Carruthers supported the intent of broadening the Rules to accommodate emerging technologies and services and considered that the proposed Energy Producing Facility classification would help simplify the Rules.

5. WHO MUST REGISTER AS AN NSP

Mr Robinson presented Slides 10 – 16.

- Referring to the proposal for CPC Facilities (Slide 12), Mr Chong asked whether its purpose was to allow third-party access when there is a single responsible controller.

Mr Robinson explained that the proposal determines when a party must register as an NSP. If there is no third-party access, the network may be treated as a Facility. If there is third-party access and/or export capability, NSP registration or another registration pathway may be required.

- Mr Gibbney asked whether CPC Facilities under the proposal must be import only.

Mr Robinson clarified that the requirement for NSP registration would apply only to CPC Facilities with material transmission infrastructure.

- Mr Williamson noted that registration status would be determined during the connection process and would affect the technical standards applied. He emphasised the importance of providing proponents with certainty regarding excluded network status early in the process.

The Chair agreed, noting that parties would likely apply for excluded network status before progressing their connection arrangements.

- Referring to Slide 13, Mr Williamson suggested replacing “a focus on the connection point, and no assessment of connection facilities” with “no assessment at the facility level.”
- Mr Carruthers supported the proposal in principle, noting its effectiveness would depend on detailed drafting.

- Ms McMahon noted the ISO had concerns regarding the proposal's complexity and would need to assess its operation across the Rules before reaching a final view.
- Referring to Slide 14, Ms McMahon asked whether the proposal that "any export must be registered as a separate Facility" meant that exporting Facilities would be assessed individually.

Mr Robinson explained that compliance would continue to be assessed at the connection point. While individual Facility assessments may remain the simplest approach in some circumstances, the proposal also seeks to enable multiple Facilities to be assessed collectively when appropriate.

- Ms McMahon reiterated that additional complexity would increase the ISO's resourcing requirements.
- Mr Van Den Dolder questioned how Facility registration for exporting Facilities would operate in practice particularly for outage coordination, ESS contracting and system operations.

Mr Robinson explained that the proposal is aligned with the ESM Rules, in which a connection point may be registered as a consumer while export capability is registered separately. He invited members to suggest alternative approaches if they considered them preferable.

- Mr Williamson noted that the current CPC Facility process requires endorsement by the relevant NSP and asked whether this requirement would continue under the proposal.

The Chair confirmed that the ISO would retain final approval.

Mr Robinson added that the intent is to allow parties to negotiate appropriate arrangements while providing the ISO with oversight and a mechanism to resolve disagreements.

- Mr Williamson emphasised the importance of ensuring existing NSPs are not required to assume erroneous obligations.
- Referring to the ISO's earlier comments, Mr Edwards asked whether implementation of the proposed framework would be based on the ISO having sufficient resources to administer it.

Mr Robinson noted that the requirement to register as NSPs would broaden the ISO fee base and ensure they contribute appropriately to relevant costs.

The Chair added that connection costs are generally recovered from connection applicants and that implementation would require further consideration of other cost recovery arrangements.

- Referring to the connection flowchart (Slide 16), Ms McMahon observed that some registration decisions depend on a Participant's commercial intentions, while others depend on technical capability. She noted that a Participant's intentions may change over time, particularly where registration depends on whether power system security and reliability can be managed through CPC measures.

Mr Robinson agreed, noting that changing circumstances may require a CPC Facility to transition to another registration category. He observed that determining how much of the connection process should be revisited in those circumstances is an important design consideration.

The Chair added that similar situations occur in the WEM and that the Rules should provide a mechanism for Participants to change registration categories if circumstances change.

- Ms O'Brien supported allowing Participants to change registration categories over time and suggested recognising work already completed during previous connection and registration processes to improve efficiency.

Mr Robinson sought members' views on whether the proposed threshold of material transmission infrastructure appropriately distinguishes between network operators that should register as NSPs and those that should not.

- Mr Van Den Dolder considered that the key consideration is whether a party has sufficient operational control over the connected assets to participate effectively within the Pilbara system.

6. INFORMATION MANAGEMENT FRAMEWORK

Mr Robinson provided a brief preview of the item, noting the substantive discussion would be deferred to the next Working Group meeting on 9 July 2026.

- Mr Williamson and Ms O'Brien noted that the Rules' chapter on confidential information is identical to the corresponding chapter of the PNAC. They recommended maintaining alignment between the PNAC and the Rules as the framework is developed.

7. GENERAL BUSINESS

The meeting closed at 11:26 am.