

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

Date:	9 July 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 4 - 7
Liz Gharghori	APA	
Lizzie O'Brien	APA	
Jasper Sng	APA	
Nathan Kirby	BHP	
Anthony Marcos Guevarra	CITIC Pacific Mining	
Glen Carruthers	Fortescue	
Ken Chong	Fortescue	
Guy Tan	Horizon Power (Pilbara Network)	
Jaden Williamson	Horizon Power (Pilbara Network)	
Steve Kenny	Horizon Power	
James Campbell-Everden	Pilbara ISOC	
Lewis Peaty	Pilbara ISOC	
Peter Van Den Dolder	Pilbara ISOC	
Matthew Kok	Rio Tinto	
Noel Michelson	Rio Tinto	
Lathin Thomas	Rio Tinto	
Nick Bardsley	Woodside	
Nenad Ninkov	Woodside	
Alistair Duffy	RBP	
Tom Coates	EPWA	
Luke Commins	EPWA	

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_06_18

The Chair noted that the draft Minutes of the 18 June 2026 Working Group Meeting were provided to members today for review with comments due by 16 July 2026.

4. INFORMATION MANAGEMENT FRAMEWORK

Mr Robinson presented Slides 6 – 18.

- Ms O'Brien noted that the current information disclosure arrangements under the Pilbara Networks Rules (Rules) are broadly consistent with information-sharing practices in other energy markets. She noted that information can still be disclosed if parties agree, with disclosure occurring in a managed manner.
- Mr Campbell-Everden highlighted that any changes to the definition of confidential information may affect the information the ISO is required to publish under condition 6 of its ACCC authorisation.

The Chair noted that previous Working Group discussions had focused on the North West Interconnected System (NWIS) model and asked how changes to the confidentiality regime would affect access to that model.

- Mr Carruthers considered that the NWIS model should generally be able to be shared with prospective connection applicants, noting that NSPs should remove any genuinely sensitive information before disclosure.

The Chair asked whether parties seeking to connect to the NWIS would be willing to provide their models to support the development and enhancement of the NWIS model.

- Mr Carruthers noted that connection applicants are already required to provide models to support connection assessments and considered that those models should be incorporated into the NWIS model.
- Mr Campbell-Everden noted that stakeholders had recently raised concerns that Original Equipment Manufacturers (OEMs) may have proprietary information contained within the NWIS model, potentially requiring consultation or other arrangements prior to disclosure.

The Chair queried whether OEMs could be considered Information Owners under the Rules if they were not party to the Rules.

- Mr Williamson explained that OEMs typically provide both encrypted and unencrypted models, with unencrypted models generally being provided only to NSPs under confidentiality agreements due to the proprietary information they contain.

- Mr Williamson and Mr Tan explained that encrypted models operate as a "black box", while unencrypted models provide access to proprietary code and internal functionality.
- Members noted that some OEMs are unwilling to share even encrypted models and may require NDAs that limit disclosure to generic models. Members also noted that similar issues arise in the National Electricity Market.

The Chair observed that this suggested OEMs were not Information Owners under the Rules, but rather that confidentiality obligations attached to information held by NSPs.

- Mr Tan noted that large load customers may also seek confidentiality protections in relation to information concerning their facilities.
- Mr Carruthers considered that encrypted models are sufficient for most connection and planning purposes and that NSPs should negotiate appropriate model-sharing rights with OEMs when procuring equipment.
- Mr Tan agreed that clear requirements in the Rules and the Pilbara Network Access Code could facilitate model sharing, although legacy equipment arrangements may continue to create difficulties.

The Chair noted that members appeared to generally agree that a functional NWIS model could be developed without access to OEM unencrypted models and that similar issues are being experienced in other jurisdictions.

- Mr Carruthers noted that, while ISOs may require access to some unencrypted models in limited circumstances, most jurisdictions address this through agreements with manufacturers and clear requirements regarding the models that must be provided for connection purposes.
- Ms O'Brien sought clarification on whether the discussion was intended to focus on issues relating to the NWIS model or broader information management arrangements.

The Chair noted that the proposed changes were also intended to ensure that functions under the Rules, including development of the Pilbara System Plan, can be undertaken effectively. She noted that planning processes may be ineffective if confidentiality arrangements continue to limit the information available to the ISO.

The Chair noted that prospective participants have previously expressed reluctance to share information regarding future plans due to concerns about transparency and disclosure to other parties.

- Ms O'Brien suggested adopting a confidentiality framework similar to that used in the WEM and NEM.

The Chair noted that under the WEM framework, information is generally public unless it can be demonstrated that it is confidential. She also noted that the current arrangements may create administrative costs and barriers to entry due to the processes associated with obtaining and using information.

Mr Robinson noted that the proposal was intended to facilitate access to information more broadly and provide a more consistent information management framework, rather than being limited to the NWIS model

- Mr Carruthers questioned whether proponents should be required to provide information for long-term planning purposes at the initial enquiry stage, noting that projects are often speculative at that point and that proponents should first have an opportunity to assess project feasibility.
- Mr Carruthers suggested that more detailed information requirements may be more appropriate at the connection application or commitment stage, when projects have greater certainty.

Mr Robinson agreed that there should be a formal mechanism in the Rules for the ISO to obtain information, but noted that this would not necessarily require the ISO to use that information in a particular way.

- Mr Williamson queried how Information Owners would know when information they had provided was proposed to be published and whether they would have an opportunity to raise concerns prior to publication

Mr Robinson noted that the WEM Rules include mechanisms, such as information registers, that identify information classifications and provide opportunities to challenge confidentiality determinations.

The Chair noted that information requests should be limited to information reasonably required to perform functions under the Rules.

Mr Robinson provided an example of the ISO requesting indicative load or generation information from prospective proponents to support long-term planning activities.

- Ms O'Brien queried whether the ISO can already request load and generation forecasts.

The Chair and Mr Robinson clarified that the ISO can request such information from Rule Participants under rule 306(1). However, issues arise in relation to the disclosure of that information to third parties and the ISO's ability to obtain information from prospective participants that are not Rule Participants.

Mr Robinson noted that one option would be to create a formal interconnection enquiry process that would provide a mechanism for prospective proponents to access the NWIS model and allow the ISO to request information from those proponents.

The Chair noted that compliance challenges may remain given the absence of specific penalties for failing to provide information.

The Chair asked members what information contained in the NWIS model may be considered confidential.

- Mr Tan noted that Horizon Power had no concerns with sharing its model but suggested that other NSPs may hold OEM information that they are unable to disclose.
- Mr Kirby noted that information which could reveal production outcomes, including changes to demand forecasts, may be commercially sensitive.

The Chair queried whether changes in injections or withdrawals at a node could allow parties to infer production information.

- Mr Kirby noted that significant reductions in load, including a reduction to zero, could potentially indicate changes in the operations of a facility.
- Ms O'Brien noted that some information may also be ASX-sensitive, particularly where it reveals the timing of commissioning, energisation or changes in operations. She noted that while information can be shared with the ISO under confidentiality arrangements, broader disclosure through the NWIS model may create issues.
- Ms O'Brien further noted that the sensitivity of information is often a timing issue, with information becoming less sensitive once relevant market announcements have been made.

The Chair queried how prospective proponents differ from existing NSPs that currently have access to the model.

- Ms O'Brien noted that entities can register as NSPs and become subject to the confidentiality obligations under the Pilbara framework.
- Mr Carruthers questioned the assumption that information on a shared network should necessarily be treated as confidential, noting that other network businesses routinely provide forecasting information without equivalent concerns.
- Mr Carruthers further noted that material changes, such as the closure of a facility, would generally be expected to be publicly announced.
- Ms O'Brien responded that, given the relatively small size of the Pilbara system, the timing of information disclosure remains important and that not all information would necessarily be suitable for wider disclosure.
- Mr Van Den Dolder clarified that, under the current Rules, entities must make connection applications before becoming registered NSPs. He also noted that access to the NWIS model is generally provided at the feasibility stage and that the current model represents a snapshot in time rather than a forecast of future developments.
- Mr Van Den Dolder further noted that forecasting information has generally not been incorporated into the model due to uncertainty regarding future developments, although this may change as the system evolves and greater certainty emerges.

The Chair noted that further consideration should be given to what information should be included in the NWIS model and the treatment of forecast information.

5. LONG TERM PLANNING

Mr Robinson presented Slides 19 – 24.

- Mr Van Den Dolder noted that the current Rules require the ISO to develop and publish a procedure, followed by preparation of the Generation Statement of Opportunity (GenSOO) and Transmission Development Plan. He questioned whether it was efficient to undertake this work if the framework may transition to a Pilbara System Plan (PSP) in the near term.

Mr Robinson noted that the development of these procedures could support future arrangements, although there may be merit in considering a direct transition to a PSP, provided this would not result in significant delays to the publication of long-term planning information.

- Mr Campbell-Everden expressed interest in further discussing this option and seeking the views of Working Group members.
- Some members questioned the value of preparing multiple long-term planning documents, noting the relatively small size of the Pilbara system, and expressed different views on the appropriate scope and frequency of planning publications.
- Ms O'Brien questioned what specific issues the proposed planning documents were seeking to address in the Pilbara, noting that similar publications in the SWIS had not resolved all market issues. She supported a longer-term strategic view of network development.

The Chair noted that planning publications can provide value by improving transparency regarding reliability, generation adequacy and network development.

The Chair also noted that some stakeholders had previously opposed delays to the publication of the GenSOO, indicating that some participants consider these publications valuable.

- Mr Tan supported development of the procedure required under the current Rules, but noted that planning documents are often conceptual and do not bind NSP investment decisions. He considered that the GenSOO may have reduced value if published shortly before a PSP.

The Chair clarified that the proposed PSP would incorporate generation and transmission planning information.

- Mr Carruthers and Mr Tan supported the development of a single integrated planning document containing both generation and transmission information.

The Chair noted that the proposed PSP would be published annually, whereas the Pilbara Integrated Plan would be updated every five years.

- Ms O'Brien supported a longer-term plan developed by the Coordinator, with a longer publication cycle.
- Mr Carruthers supported regular updates regarding transmission developments and longer-term forecasting information.

The Chair noted that investors are likely to expect transparency regarding future network constraints and developments.

- Mr Carruthers considered that certain information, including network constraints, may be more appropriately published separately from a long-term plan.
- Mr Van Den Dolder noted that the ISO already has functions relating to the publication of network constraint information and would seek to continue publishing this information on a regular basis.

The Chair summarised that members had generally supported further consideration of a single integrated long-term planning document, containing generation and transmission information, with publication frequency and governance arrangements to be considered further, including through consultation with the Pilbara Advisory Committee.

6. ESS COST RECOVERY

Mr Robinson presented Slides 25 – 32. He highlighted that ESS cost recovery arrangements are being considered as part of broader reforms required to facilitate increased renewable penetration, as the current arrangements may not be robust in a system with higher levels of renewable generation.

- Mr Williamson sought clarification regarding the use of scheduled and metered quantities in relation to regulation reserve cost allocation. He noted that balancing is currently undertaken through allocations and queried whether "scheduled" quantities referred to those allocations.

Mr Robinson confirmed that Rule Participants meeting their balancing obligations should not drive the need for regulation services. He noted that the proposal is intended to allocate regulation costs to Rule Participants that contribute most to balancing deviations over time.

- Mr Williamson noted that implementation of the contingency reserve proposal would need to consider existing metering arrangements, including that NSPs currently provide meter data at network connections to the ISO and may not have metering at individual generators. He also noted that consideration would be required as to how the approach would apply to different generation technologies.

Mr Robinson acknowledged these data and implementation issues, and that they would require further consideration.

- Mr Van Den Dolder noted that consideration would also need to be given to how regulation cost allocation would apply to balancing nominees that are providing FCESS, as these providers may intentionally be moved out of balance while providing the service.

Mr Robinson agreed that FCESS providers would need to be excluded from the regulation allocation methodology when providing those services.

7. GENERAL BUSINESS

The Chair noted that a summary of discussions from the meeting would be provided to the Pilbara Advisory Committee at its meeting on 23 July 2026.

The meeting closed at 11:26 am.