SUBMISSION

Empire Carbon & Energy submission on the issues paper of 20 July 2026 — institutional design, transparency, competitive neutrality and the evidence base for an SEO determination

Prepared for	Energy Policy WA — Department of Energy and Economic Diversification
Prepared by	Liz Aitken, Principal, Empire Carbon & Energy
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To: epwa-submissions@deed.wa.gov.au

Attention: Energy Policy WA, Department of Energy and Economic Diversification

Date: 6 August 2026

Subject: Submission — Issues paper on connections and data quality for distributed energy resources (Making it easier to connect solar, batteries and EV chargers)

Closing date: 5 pm AWST, Tuesday 18 August 2026

This submission is provided for publication. It contains no confidential information.

Purpose. This submission responds to the issues paper Making it easier to connect solar, batteries and EV chargers, released on 20 July 2026. Empire Carbon & Energy supports the policy objective. The SWIS does have a DER standing data problem, the paper documents it credibly, and several of the seven proposals are sound and should proceed promptly. Our observations concern institutional design rather than technical content: who holds which function, how the instruments that determine obligations are made and reviewed, how information flows between parties who compete with one another, and whether the record supports the decisions taken. We have confined ourselves to matters of governance and market integrity, on the basis that other parties are better placed to quantify commercial impact. Nothing in this submission alleges impropriety by any party. Where we identify a concern it is structural — arising from the allocation of functions and the design of review mechanisms, and would arise whoever occupied the roles.

1. THE STATE ELECTRICITY OBJECTIVE REQUIRES A COST BASIS THAT DOES NOT EXIST

Observation: The State Electricity Objective requires decision-makers to promote the long-term interests of consumers having regard to, among other things, the price of electricity. It is a statutory decision-making criterion, not a statement of aspiration. The issues paper invokes the SEO repeatedly as the justification for the reform package.

The paper quantifies benefits and does not quantify costs. It cites $4.1 billion of avoided grid-scale investment, $22 billion of forgone savings, $19 billion of NEM economic benefit and $920 million from Project Symphony. Three of the four are NEM-wide and, as the paper itself explains at section 4.1, the SWIS differs materially in structure and participant numbers. None of the four is an estimate of the benefit of these seven proposals; each estimates the value of DER orchestration at scale, to which improved standing data is one input among many. Against those figures the paper contains no cost estimate of any kind — for Western Power, retailers, aggregators, equipment manufacturers or consumers. The words "low-cost" appear as assertion.

A decision cannot be shown to promote the long-term interests of consumers having regard to price when the price consequence has not been estimated. This is a defect in the evidence base for an SEO determination, not merely an omission from a consultation paper. It also has a practical consequence for the access arrangement process: expenditure proposed on the basis of obligations whose industry-side costs were never assessed is difficult for the Economic Regulation Authority to test and difficult for network users to contest.

- Recommendation: DEED publish a Western Australian cost–benefit assessment for each of the seven proposals, covering costs to Western Power, retailers, aggregators, manufacturers and consumers as well as benefits, and provide an opportunity for comment on it before the exposure draft is released.
- Recommendation: the assessment identify what portion of the Project Symphony value is attributable to standing data quality as distinct from orchestration capability, market arrangements and customer recruitment, and state which of the cited NEM figures DEED considers transferable to the SWIS and on what basis.

Basis: State Electricity Objective; issues paper sections 2.2, 2.3, 4.1, 6; AEMO 2025 CER Data Exchange Industry Co-Design Summary p. 14.

2. THE GOVERNANCE STRUCTURE HAS BEEN SET ASIDE WITHOUT PUBLISHED ANALYSIS

Observation: Four years of published work converged on a common institutional answer. The DER Orchestration Roles and Responsibilities Information Paper (2022) established the DSO, DMO and aggregator functions and identified the need for a comprehensive data solution. The Project Symphony final report (2024) recommended a DER data hub as a single source of truth. The Project Jupiter policy work developed a federated data exchange together with an explicit governance structure: a coordinating function under the Coordinator of Energy, a cross-sector advisory body, an operator to implement and manage the platform, and data custodians responsible for their own data.

The issues paper sets that structure aside in a single sentence at section 4: "DEED considers that because of the relative simplicity of the SWIS, mandating a specific data exchange mechanism and its associated governance structure is not currently necessary." No supporting analysis is published or referenced.

We would distinguish the two limbs of that sentence. The case against mandating a specific technical mechanism is reasonable and we do not contest it; a smaller market with fewer participants and no meter contestability may not warrant the platform architecture designed for the NEM. The case against the governance structure does not follow from the same premise. Governance arrangements exist to manage conflicting interests, information asymmetry and the exercise of discretion. Those conditions are not a function of how many participants a market has. On the paper's own account the SWIS has fewer participants, each holding a larger share of the relevant functions — which tends to increase rather than reduce the need for institutional separation. The stated reason does not reach the thing being removed.

The practical effect is that functions the governance layer was designed to oversee — collection, validation, sharing, and specification of what must be supplied — are consolidated within a single regulated entity that also writes the instrument defining them.

- Recommendation: DEED publish the analysis supporting the conclusion that a governance structure is not currently necessary, including any work undertaken within Project Jupiter and the technical design authority output procured by Western Power.
- Recommendation: DEED retain a proportionate governance layer scaled to the SWIS rather than removing it — at minimum a standing cross-sector advisory function with visibility of data specification decisions, and a defined role for the Coordinator of Energy in relation to the data functions.
- Recommendation: if the governance structure is not retained, the exposure draft explain what alternative safeguards apply to the exercise of the data specification power, and why they are considered adequate.

Basis: Issues paper section 4 and section 4.1; DER Orchestration Roles and Responsibilities Information Paper 2022; Project Symphony final report 2024; Project Jupiter policy work as described at section 4.

3. SELF-SPECIFICATION — THE PARTY SETTING THE SCOPE BEARS NONE OF ITS COST

Observation: Proposal 2 would establish obligations on Western Power to collect, validate and share DER standing data. The ESM Rules would set minimum obligations as to level of detail, sharing frequency and data recipients, while the specific data fields would be set by Western Power in a WEM Procedure on which it consults.

The cost of a data obligation is a function of its content: which fields, at what frequency, at what granularity, from whom. Under this design the entity that determines that content is not the entity that bears the cost of complying with it. Western Power captures the full planning benefit of each additional field; the cost of supplying it falls on retailers, installers and aggregators. Where the party setting scope faces none of the cost of scope, scope tends to expand, and consultation is a weak discipline against that tendency — the practical answer to a proposition that a further field would be useful is almost always affirmative.

This is compounded by the open-ended framing at Proposal 2 that obligations "will evolve over time and new data sharing obligations may emerge for other rule participants." An unbounded future obligation on an unidentified class of parties cannot be priced, and is therefore priced conservatively or avoided, with consequences for product development that arise immediately and before any obligation exists.

We note that the first WEM Procedure made under the narrower Tranche 9 function — the WEM Procedure: Technical Requirements for Standard Small User Facilities, commencing 1 May 2026 —

was published to the required timetable and accompanied by a joint industry forum on 19 February 2026. We raise no criticism of compliance. We observe only that the Procedure is published among instruments directed at transmission-connected market participants, and that Energy Policy WA's own guidance directs installers to a separate Western Power document rather than to the Procedure itself. The mechanism for proposing a change is an email address and an optional subscription list. As a precedent for an instrument that would determine industry-wide compliance cost, that is not sufficient.

- Recommendation: the ESM Rules impose a materiality and cost-proportionality test on the addition of data fields, requiring Western Power to assess and publish the cost to supplying parties before a field is added.
- Recommendation: the ESM Rules specify publication, notification and consultation requirements for the data specification procedure, including a minimum consultation period, direct notification to affected classes including installers, retailers and aggregators, and publication in a location directed at those parties.
- Recommendation: the ESM Rules provide a review path — to the Coordinator of Energy or the Economic Regulation Authority — where a party considers a procedure-level data requirement disproportionate, and DEED identify which body is to test the cost of the data specification as distinct from the cost of Western Power's own systems.
- Recommendation: any extension of obligations to "other rule participants" require a rule change rather than a procedure amendment.

Basis: Issues paper section 5, reform proposal 2; EPWA Consultation Summary Paper, December 2025, section 2.1; WEM Procedure: Technical Requirements for Standard Small User Facilities (commenced 1 May 2026).

4. THE RULES SHOULD CONSTRAIN WHAT PROCEDURES MAY LATER OCCUPY

Observation: Across the package, obligations are created in one instrument and calibrated in another. The Rules would establish that data must be collected and shared; the content goes into procedures. The Proposal 6 mechanism is expressly unresolved, DEED noting that there is "currently no agreement about what a complete set of VPP data may look like." Stakeholders are therefore consulted on a frame rather than on the obligations the frame will carry, and the subsequent consultation is on drafting rather than on whether an obligation should exist.

We do not object to the use of subordinate instruments, which is appropriate for technical detail that must evolve. We object to the absence of any boundary on what they may contain. A small number of constraints placed in the Rules would preserve the flexibility of the procedure mechanism while preventing open-ended expansion after the consultation has closed. Each is inexpensive to include, and none prevents the reform from operating.

- Recommendation: the ESM Rules specify a maximum reporting frequency and a minimum level of aggregation below which data may not be required without a rule change.
- Recommendation: the ESM Rules include an express purpose limitation confining use of data collected under these obligations to system planning and network operation.

- <u>Recommendation:</u> the ESM Rules prohibit use of data collected under these obligations in the collecting party's own commercial, procurement or competitive activities, and restrict onward disclosure.

Basis: Issues paper section 5, proposals 2 and 6; section 7.

5. COMPETITIVE NEUTRALITY AND THE FLOW OF COMMERCIALLY SENSITIVE INFORMATION

Observation: The Tranche 9 Rules designated Western Power as DSO and required that procurement of aggregation services involving non-contestable customers occur only through Synergy, with Synergy required to develop the Third Party Aggregator Framework governing third-party access. Synergy is also the retailer for all non-contestable customers and operates what the issues paper describes as a VPP expected to be among the largest in the world. Western Power is the DSO, would specify the data under Proposal 2, procures network support services, and is the lead organisation for Project Jupiter.

Several stakeholders raised Synergy's dual role in the Tranche 9 consultation. Energy Policy WA declined to amend the Rules, on the basis that the arrangement gives effect to an established policy position on retail contestability settled in March 2022 and noted that Synergy's conduct remains subject to the Competition and Consumer Act 2010. We accept that the market structure question was determined then and do not seek to reopen it.

The question raised by Proposal 6 is different in kind, and the earlier answer does not reach it. Tranche 9 concerned who may contract with whom. Proposal 6 concerns what information about a competitor's business is routed to whom. If VPP operators are required to report controllable capacity, and particularly if reporting extends to NMI-level enrolment, the recipients would include a network business that procures network support services from those same operators and would sit alongside a retailer that is both the mandated parent aggregator and the largest competing VPP operator. Portfolio size, composition and location are among the most commercially sensitive information an aggregator holds.

We note the tension within the paper on this point. Table 4 records Western Power's purpose as including validation "that VPP enrolments for a single NMI are not accidentally double counted." That validation is inherently NMI-level and cannot be performed on aggregate controllable capacity. Either the mechanism will extend to NMI-level enrolment data, with the consequences described above, or the stated purpose is not met. This should be resolved before the exposure draft, because it determines both the cost and the information-flow implications of the proposal.

- <u>Recommendation:</u> DEED undertake and publish a competitive neutrality assessment of the proposed information flows, addressing Synergy's combined roles as retailer, parent aggregator, author of the Third Party Aggregator Framework and VPP operator, and Western Power's combined roles as DSO, data specifier, procurer of network support services and Project Jupiter lead.

- <u>Recommendation:</u> DEED state whether NMI-level VPP enrolment data is contemplated now or in future. If it is, the ESM Rules — not a procedure — specify aggregation thresholds, confidentiality classification, information firewalls within recipient organisations, and an express prohibition on use in network support service procurement or in the recipient's own retail or aggregation activities.

- Recommendation: where a stated purpose cannot be achieved by the proposed mechanism, DEED either amend the mechanism or withdraw the purpose, rather than leaving the inconsistency to be resolved in a subordinate instrument.

Basis: Issues paper section 4.1 and footnote 9; section 4.2 and Table 4; section 5, Principle 3; Electricity System and Market Amendment (Tranche 9) Rules 2025; EPWA Consultation Summary Paper, December 2025, section 2.3.

6. PROPOSAL 6 — THE OBLIGATION IS PROPOSED TO ATTACH TO THE WRONG PARTY

Observation: DEED identifies that VPP operators are not necessarily market participants, so no compliance and enforcement mechanism presently applies to them, and proposes as a solution that the obligation be placed on market participants "in relation to their own VPP capabilities and/or any VPP operators they partner with to provide services."

Placing a regulatory obligation on one commercial party in respect of information held by another is a departure from ordinary regulatory design and has predictable consequences. It will be managed contractually through data warranties, audit rights, indemnities and liability caps, lengthening negotiation and raising the cost of every aggregator–participant arrangement. It will make market participants reluctant to contract with operators too small to stand behind those warranties. The practical effect is that access to the market becomes contingent on locating a participant willing to accept regulatory liability on another firm's behalf. In a paper that identifies lower barriers for new entrants and a foundation for innovation among the benefits of reform, this is the element most likely to produce the opposite.

The alternative route flagged — registration under the Alternative Electricity Services framework — resolves the enforcement problem but substitutes a fixed compliance cost that is immaterial to a large participant and material to a small one, with predictable consequences for market concentration.

We also note that the proposed definition turns on the intent behind a control instruction. DEED's own illustration concedes the difficulty: an aggregator instruction to charge from the grid to exploit low daytime prices is captured, while an internal optimisation producing the identical physical outcome is not. A test that cannot be observed externally cannot be effectively enforced, and can only be evidenced by an operator through per-dispatch purpose logging. We support the concept of controllable capacity, which is well suited to the planning purpose and cheaper than device-level reporting, but it requires a specified calculation basis if the reported values are to be capable of aggregation.

- Recommendation: the reporting obligation attach directly to the entity that operates the VPP and holds the data, with the Alternative Electricity Services framework or an equivalent registration used to provide the compliance hook, together with a de minimis threshold exempting small operators.

- Recommendation: the definition of a VPP be recast on an objective basis — for example, control exercised under a contract to provide a service to a third party — rather than on the intent behind an instruction.

- Recommendation: DEED specify the calculation basis for controllable capacity, including time of assessment, assumed state of charge, firm versus expected treatment, coincidence with system peak and customer opt-out assumptions, or alternatively require disclosure of method alongside the reported value.

Basis: Issues paper section 5, Principle 3 and proposal 6; section 4.2 and Table 4.

7. SEQUENCING — OBLIGATIONS ARE BEING SETTLED AHEAD OF THEIR COST, AND AHEAD OF AA6

Observation: The paper states at section 2.4 that new DER data arrangements "will include obligations and opportunities for Western Power and its network users, and it is important that Western Power is able to reflect the changes as part of its regulatory reset submission to the ERA, due in February 2027." Western Power's sixth access arrangement proposal is due on 1 February 2027 for a period commencing 1 July 2028.

Under the Electricity Networks Access Code, forecast capital expenditure must satisfy the new facilities investment test and forecast operating expenditure must be that which a prudent service provider acting efficiently and in accordance with good electricity industry practice would incur, including to comply with applicable written law. Those framings produce materially different reviews. Expenditure proposed as a discretionary capability improvement is open to examination of whether it is warranted, at what scale, and for whose benefit. Expenditure proposed as the minimum necessary to discharge an express obligation in the ESM Rules is open only to examination of efficiency. Creating the obligation before its cost is known therefore narrows the scope of the ERA's review and correspondingly narrows the scope for network users to contest the expenditure.

We make no criticism of Western Power for sequencing its regulatory submissions sensibly. The observation is about the order in which the two processes are being run, which is a matter for DEED. We also note a structural tension deserving attention in the AA6 framework: the benefit case for these reforms rests on deferring network augmentation, while augmentation is the principal driver of regulated asset base growth. Nothing in the paper, and nothing yet visible in the AA6 framework and approach, requires Western Power to demonstrate augmentation actually deferred as a consequence of the data it would be funded to collect.

- Recommendation: the Proposal 2 obligations not commence until a cost assessment has been published, notwithstanding the consequences for the timing of the AA6 submission.
- Recommendation: DEED confirm whether it intends the associated expenditure to be treated as compliance-driven in the AA6 review, and if so, that it states this expressly so the ERA and network users can respond.
- Recommendation: DEED and the ERA establish a reporting obligation requiring Western Power to demonstrate network augmentation deferred as a result of improved DER data, so that the benefit relied upon to justify the expenditure is subsequently measured.

Basis: Issues paper section 2.4; Electricity Networks Access Code 2004; ERA framework and approach for Western Power's sixth access arrangement review; Access Code amendments deferring the AA6 period to 1 July 2028.

8. PROJECT JUPITER — SCOPE, DISCLOSURE AND COMMONWEALTH FUNDING

Observation: Project Jupiter is described at section 1 as a $108 million three-year project partially funded by ARENA, with DEED thanking AEMO, Synergy and Western Power for feedback in developing the paper. The paper does not disclose that Western Power — Electricity Networks Corporation — is the lead organisation for the ARENA grant of $20.8 million under the Advancing Renewables Program, with Synergy, AEMO and DEED as project partners, for a project running from 1 February 2025 to 17 January 2028.

ARENA's published outcome statements for the project include the delivery of "a single integrated DER orchestration system enabling stakeholders to fulfil their roles and obligations in the market." That outcome corresponds to the data exchange architecture recommended through Project Symphony and developed through the Jupiter policy work. The issues paper sets that architecture and its governance aside without published analysis, as addressed at section 2 above. Where a publicly funded project's stated outcome is materially narrowed, and the narrowing is proposed by a project partner in respect of functions that transfer to the project lead, the reasoning should be on the public record.

A related question concerns cost recovery. Capability developed with Commonwealth grant funding and partner contributions to January 2028 would support a statutory function recovered through network tariffs from July 2028. Assets funded by third-party contributions are ordinarily excluded from a regulated capital base or treated as capital contributions, so that customers do not pay a return on assets they did not fund. The boundary between grant-funded and customer-funded capability should be identified explicitly and be capable of verification by the ERA. We note that the AA6 proposal is due on 1 February 2027, approximately a year before Project Jupiter concludes, so the enduring cost would be forecast before the funded project has reported.

- Recommendation: DEED disclose in the exposure draft materials that Western Power is the lead organisation for Project Jupiter, and publish the technical design authority output and the stakeholder feedback relied upon in developing the issues paper.
- Recommendation: DEED confirm whether capability funded by the ARENA grant and by project partner contributions will be excluded from Western Power's AA6 capital base or treated as a capital contribution, and how the boundary will be identified and verified.
- Recommendation: DEED state how the enduring cost of these functions is to be forecast in advance of Project Jupiter's conclusion, and whether the forecast will be revised once the project has reported.

Basis: Issues paper sections 1 and 4; ARENA project record for Project Jupiter (lead organisation Electricity Networks Corporation; $20.8 million of $108.34 million; 1 February 2025 to 17 January 2028) and published project outcomes; Western Power submission to the Tranche 9 consultation, 20 November 2025; Electricity Networks Access Code 2004.

9. CONSISTENCY WITH POSITIONS TAKEN IN THE PRECEDING CONSULTATION

Observation: Two positions taken in the Tranche 9 consultation, concluded in December 2025, bear on this paper and should be addressed rather than passed over.

First, on interoperability, Energy Policy WA advised that the Rules do not prescribe interoperability standards, that the requirements commencing 1 May 2026 "do not specifically require CSIP-AUS", and that the Government would instead encourage retailer adoption — reasoning by reference to national harmonisation, the protocol's open-source character and existing product support. Proposal 1 would convert that encouragement into a statutory mandate on every inverter up to 30 kVA, fixed to a named version of the standard, within approximately twelve months. What is presently in place is one retailer's chosen method of discharging the remote disconnection requirement under its own functionality requirements, not a regulatory standard. The reasons given for not mandating have not, so far as we are aware, changed. A reversal of a recently stated position should be explained.

Second, on the DSO, stakeholders raised the potential future cost of expanded functions and were advised that no additional functions would be assigned "without consultation and consideration of needs beyond Western Power's existing network operation functions." This paper is that consultation and the commitment is being honoured in form. The cost concern that prompted the assurance, however, remains unanswered, and section 1 above sets out why that matters for the SEO assessment.

- Recommendation: DEED explain what has changed since February 2026 to warrant mandating CSIP-AUS, and address whether a retailer-level implementation method is the appropriate subject of a Rules obligation.

- Recommendation: the Rules reference CSIP-AUS generically, with the applicable version specified in a subordinate instrument that tracks the national standard, so that version updates do not require a rule change or strand the installed fleet.

- Recommendation: DEED state how systems that are "upgraded" will be treated, and in particular whether any customer adding a battery to an existing installation may be required to replace a functional inverter to achieve compliance. We note the Tranche 9 summary confirms existing customers are captured upon installing new DER at the site or altering an existing installation, so the capture mechanism is already settled and only the requirement attaching to it remains open.

Basis: EPWA Consultation Summary Paper, December 2025, sections 2.1, 2.2 and 2.4; EPWA guidance, New requirements for small-scale solar and battery systems, updated 24 February 2026; Statement on Interoperability of Distributed Energy Resources, May 2025; issues paper section 5, Principle 1.

10. MATTERS EMPIRE SUPPORTS

Observation: We record our support, without qualification, for proposals 3, 5 and 7. Indirect collection of EV charger data through the existing electrical certificate process is a proportionate mechanism that imposes negligible additional burden. Publication of forecast and historical distribution network capacity is a straightforward transparency measure that also creates a useful accountability record, since forecast and actual feeder capacity can be compared over time. Spatial publication of network opportunities, extending the approach already demonstrated through the interactive network opportunity map, addresses a genuine information asymmetry and directly supports competition in aggregation and charging infrastructure.

These three proposals deliver a material part of the paper's stated objective at minimal cost to industry and without raising the governance questions addressed above. In our view they should not be held to the pace of the more contested elements of the package.

- Recommendation: DEED progress proposals 3, 5 and 7 on a separate and faster track, and confirm that published network capacity information will be provided at feeder level, in machine-readable form, free of charge, and to any prospective proponent irrespective of an existing contractual relationship with Western Power.

- Recommendation: the spatial opportunity mapping obligation extend across the distribution network rather than being confined to areas in which Western Power has already identified a network support service requirement.

Basis: Issues paper section 5, proposals 3, 5 and 7; section 4.2 and Table 3.

CLOSING

Empire Carbon & Energy would welcome the opportunity to discuss any aspect of this submission, and is willing to participate in further consultation on the exposure draft and on the subordinate instruments that will carry the substantive obligations. We would encourage DEED to treat the design of those instruments, and the arrangements for reviewing them, as a first-order question rather than as implementation detail. The institutional choices made in this reform will outlast the technical requirements it introduces.

Yours sincerely,

Liz Aitken

Principal

Empire Carbon & Energy

liz@empirecae.com

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SUMMARY OF RECOMMENDATIONS

Overview. The recommendations made through this submission are consolidated below by theme. Empire's overriding recommendation is that DEED treat the design of the subordinate instruments, and the arrangements for making and reviewing them, as a first-order matter to be settled before the exposure draft rather than as implementation detail to follow it.

Evidence base and the State Electricity Objective (Section 1)

1. Publish a WA-specific cost–benefit assessment for each of the seven proposals — covering costs to Western Power, retailers, aggregators, manufacturers and consumers, not only benefits — and allow comment on it before the exposure draft.
2. Identify what portion of the Project Symphony value is attributable to standing data quality as distinct from orchestration, and state which cited NEM figures DEED considers transferable to the SWIS and why.

Governance (Section 2)

3. Publish the analysis supporting the conclusion that a governance structure is not currently necessary, including relevant Project Jupiter and technical design authority work.

4. Retain a proportionate governance layer scaled to the SWIS — at minimum a standing cross-sector advisory function with visibility of data specification decisions, and a defined role for the Coordinator of Energy.
5. If the structure is not retained, explain in the exposure draft what alternative safeguards apply to the data specification power and why they are adequate.

How the instruments are made and reviewed (Sections 3 and 4)

6. Impose a materiality and cost-proportionality test on the addition of data fields, requiring the cost to supplying parties to be assessed and published before a field is added.
7. Specify publication, notification and consultation requirements for the data specification procedure, including a minimum consultation period, direct notification to installers, retailers and aggregators, and publication where those parties will find it.
8. Provide a review path — to the Coordinator of Energy or the ERA — where a party considers a procedure-level requirement disproportionate.
9. Require any extension of obligations to other rule participants to proceed by rule change, not procedure amendment.
10. Fix in the Rules a maximum reporting frequency, a minimum aggregation level, an express purpose limitation confining use to system planning and network operation, and a prohibition on use of collected data in the collecting party's own commercial, procurement or competitive activities.

Competitive neutrality and information flow (Section 5)

11. Undertake and publish a competitive neutrality assessment of the proposed information flows, addressing Synergy's combined roles and Western Power's combined roles.
12. State whether NMI-level VPP enrolment data is contemplated. If it is, set aggregation thresholds, confidentiality classification, information firewalls and use prohibitions in the Rules, not a procedure.
13. Where a stated purpose cannot be achieved by the proposed mechanism, amend the mechanism or withdraw the purpose rather than leaving the inconsistency to a subordinate instrument.

Proposal 6 — VPP capacity data (Section 6)

14. Attach the reporting obligation to the entity that operates the VPP and holds the data, with a registration mechanism providing the compliance hook and a de minimis threshold for small operators.
15. Recast the definition of a VPP on an objective basis, such as control under a contract to provide a service to a third party, rather than on the intent behind an instruction.
16. Specify the calculation basis for controllable capacity or require disclosure of method alongside the reported value.

Sequencing and the AA6 review (Section 7)

17. Do not commence the Proposal 2 obligations until a cost assessment has been published, notwithstanding the effect on the timing of the AA6 submission.
18. Confirm whether the associated expenditure is intended to be treated as compliance-driven in the AA6 review, and state this expressly if so.

19. Establish a reporting obligation requiring Western Power to demonstrate network augmentation deferred as a result of improved DER data.

Project Jupiter (Section 8)

20. Disclose in the exposure draft materials that Western Power is the lead organisation for Project Jupiter and publish the technical design authority output and the stakeholder feedback relied upon.
21. Confirm whether capability funded by the ARENA grant and partner contributions will be excluded from Western Power's AA6 capital base or treated as a capital contribution, and how the boundary will be verified.
22. State how the enduring cost of these functions is to be forecast ahead of Project Jupiter's conclusion, and whether it will be revised once the project has reported.

Consistency with the preceding consultation (Section 9)

23. Explain what has changed since February 2026 to warrant mandating CSIP-AUS, and whether a retailer-level implementation method is the appropriate subject of a Rules obligation.
24. Reference CSIP-AUS generically in the Rules, with the version set in a subordinate instrument tracking the national standard.
25. State how “upgraded” systems will be treated, and whether any customer adding a battery may be required to replace a functional inverter to comply.

Matters Empire supports (Section 10)

1. Progress proposals 3, 5 and 7 on a separate, faster track, with network capacity information provided at feeder level, machine-readable, free of charge and open to any prospective proponent.
2. Extend the spatial opportunity mapping obligation across the whole distribution network, not only where a network support service need has been identified.