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Submitted via email: EPWA-Submissions@deed.wa.gov.au

Dear Sarah

Western Power's Submission to the Consultation on "Making it easier to connect solar, batteries and EV chargers"

Western Power appreciates the opportunity to provide feedback on the Department of Energy and Economic Diversification's (DEED's) issues paper on *Making it easier to connect solar, batteries and EV chargers*.

Western Power broadly supports the direction of these proposed reforms, considers them generally consistent with the State Electricity Objective (SEO) and considers that they have the potential to:

- Support the safe and efficient operation of the network through improved distributed energy resources (DER) data quality and visibility;
- Promote the efficient operation of the network by better enabling DER participation in Virtual Power Plants (VPPs) which can provide Network Support Services (NSS);
- Support environmental outcomes by enabling more solar, batteries and EV charging to connect to the network.

Western Power's support is subject to the reforms being clearly scoped, technically practical, aligned with existing regulatory frameworks and capable of efficient implementation through Western Power's systems, processes and regulatory funding arrangements. **Table 1** provides more detailed feedback on each reform proposal, but in summary Western Power:

1. **Supports** the requirement for inverters in Standard Small User Facilities to be **CSIP-AUS enabled**;
2. **Supports in principle** introducing **DSO functions to collect, validate and share DER standing data** subject to further clarity on the use cases to be supported, the relationship with the WA DER Register, and impacts to the Metering Code;



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3. **Supports in principle** improving **data collection for electric vehicle (EV) chargers** subject to confirmation that the indirect data collection pathways are fit-for-purpose for network and system planning, and that any future obligations recognise the limitations of indirect data sources outside Western Power's direct control;
4. **Supports in principle** the use of standardised data to support more streamlined DER connection pathways, subject to further clarity on the practical benefits and scope of any new obligations. Standardisation may improve data quality and process consistency, but will not necessarily reduce connection timeframes, particularly for systems above 30 kVA where technical assessment is likely to remain a key driver of connection complexity;
5. **Supports in principle** sharing additional **distribution network capacity** information, subject to clarity on how any new requirements would interact with existing obligations and tools, including the Network Opportunity Map (**NOM**), Interactive Network Opportunity Map (**iNOM**) and Network Capacity Mapping Tool (**NCMT**), and subject to the benefits of publishing historical capacity data being demonstrated;
6. **Supports further work** to define **VPPs and explore fit-for-purpose mechanisms for collecting simple capacity data**;
7. **Supports in principle** the use of spatial mapping tools to communicate **distribution network capacity and VPP opportunities**, provided any future obligations are aligned with clear industry use cases, build on existing iNOM and NCMT capability, and provide benefits proportionate to the cost and effort of implementation, maintenance and ongoing data management.

While Western Power broadly supports the intent of the proposed reforms, several initiatives may introduce new ongoing obligations relating to data collection, validation, sharing, publication and supporting system capability. Western Power recommends that detailed reform design be informed by a structured assessment of customer benefits, costs, implementation responsibilities and funding pathways. This should include consideration of whether each function is assigned to the party best placed to deliver it efficiently, and whether associated costs should be recovered through regulated revenue, direct government funding or another appropriate mechanism.

As the reforms progress to detailed rule design, Western Power recommends that the next stage:

- **Uses collaborative consultation and co-design with Western Power and other relevant stakeholders**, so future obligations are practical, clearly scoped and aligned with implementation requirements;
- **Builds on existing and emerging capability** including the DER connections re-design and Western Power's network capacity tools;
- **Provides sufficient clarity on data-sharing requirements**, including data type, purpose, frequency, recipient and whether disclosure is mandatory, to ensure obligations operate consistently with the Metering Code and other confidentiality requirements;
- **Aligns with the sixth access arrangement (AA6) process** so that any new or expanded obligations are sufficiently clear in scope, timing and implementation requirements to be reflected in Western Power's regulatory submission to the Economic Regulation Authority and support the recovery of efficient costs.

If you have any questions regarding this submission, please contact Energy Markets Regulation Manager, Andy Kondola at [REDACTED]

Yours sincerely,

Matt Veryard
Head of Regulation

Table 1: Summary of Western Power's comments to each reform proposal

#	Proposal	Comment
1	Require inverters up to 30 kVA to be CSIP-AUS (v1.2) enabled to support interoperability of DER devices	Western Power supports this proposal for Standard Small User Facilities and recognises the benefits of CSIP-AUS enabled inverters in improving DER interoperability, supporting more consistent standing data exchange and the potential to enable better DER compliance outcomes. CSIP-AUS supports communications and interoperability and may provide easier access to some standing data and device capability information. However, it does not itself ensure data completeness, technical compliance, or validation of behind-the-meter DER behaviour. Any future reliance on CSIP-AUS in these areas should be clearly scoped and aligned with the protocol's capability. Western Power recognises that this proposal relates to the communication between an aggregator and DER devices and is also building capability and systems to support CSIP-AUS communications with aggregators.
2	DSO functions to collect, validate, and share data	Western Power supports this proposal in principle and recognises the importance of clearly defined DSO functions to improve the collection, validation and sharing of DER standing data obtained through the connections process. Western Power recommends that any new obligations be developed by first identifying the specific use cases the data is intended to support, as this will provide clarity on: • Data fields, validation requirements, sharing frequency, recipients and implementation pathway; • The scope of DER connection pathways under consideration (such as 0-30kVA, 30-200kVA and 200-999kVA); • The intended relationship between any new DSO data obligations and the existing WA DER Register framework; • The extent to which obligations would apply to data collected by Western Power directly, or data sourced from third parties; • The secure data-exchange capability, interfaces, standards and governance arrangements required to support sharing without providing external access to Western Power's enterprise systems. Western Power also notes that any requirements on the DSO to share data will need to consider limitations that may exist under the Metering Code and other confidentiality obligations. Any ESM Rules data-sharing obligation should clearly specify the data, recipient, purpose and whether disclosure is mandatory. This will ensure Western Power can rely on the applicable Metering Code disclosure pathway without having to make a judgement call. This is particularly important where data sharing with broader industry participants is proposed, as this is likely to be more complex than sharing with AEMO, DEED or another clearly identified statutory or regulatory body. Any future data-sharing obligation will also require a clearly defined, secure and appropriately funded data-exchange model. Western Power would not expect external parties to be provided with direct access to its enterprise systems. Detailed reform design should therefore identify: • the required exchange interfaces or platform capability; • access controls; • data standards;

#	Proposal	Comment
		• governance arrangements; • operating responsibilities; and • ongoing support requirements. DEED should also consider whether a common or interoperable data-exchange approach across relevant parties would provide better whole-of-system efficiency than requiring each participant to develop separate bilateral solutions. Any required capability should be included in the assessment of implementation costs, responsibilities, timing and funding pathways. In relation to validation, Western Power does not have access to DER telemetry behind the connection point. Advanced Metering Infrastructure (AMI) data can support streamlined validation and analytics but is measured at the connection point and may not be sufficient to validate DER standing data in all use cases.
3	Indirect data collection for EV chargers	Western Power supports in principle improving the visibility of EV supply equipment (EVSE) connected to the network. Improved EVSE visibility will become increasingly important for network planning as EV uptake increases and charging behaviour has a greater impact on local network demand. Before introducing any related obligations, it is recommended that DEED consider whether any indirect data is fit-for-purpose to be relied upon for network and system planning, including whether EVSE-specific fields, structured data capture and validation requirements are needed. In addition, any future obligations on indirect data collection should recognise that the completeness, accuracy and timeliness of that data may be outside Western Power's direct control. Western Power supports leveraging existing processes where practical but considers that the notifiable works process in its current form has limitations in providing data that could later be relied upon for network and system planning. For example: • EVSE installations may not always be classified as notifiable works, so data would not be consistently provided to Western Power; • Where data is provided to Western Power, Electrical Safety Certificates rely on text fields, reducing data quality and consistency.
4	Standardised data to create an easier connection pathway	Western Power supports in principle the use of standardised data to support more streamlined DER connection pathways, subject to clarity on the scope of any new obligations and alignment with the ongoing DER connections re-design for systems up to 1 MVA. Standardised data may improve the consistency and quality of information received and support opportunities for process automation. However, standardisation will not necessarily result in faster connections. For systems above 30 kVA, technical assessment requirements, site-specific characteristics and connection complexity are likely to remain significant drivers of assessment effort and timeframes. The 30–200 kVA and 200–999 kVA pathways are materially more complex than residential-scale pathways, and the intended scope and timing of the re-design for these systems are still being developed. Western Power recommends that DEED clarify: • Whether obligations are intended to apply to the structure of the connections pathway, the associated data exchange, or both; • The level of simplification and automation expected for each connection pathway; • The data collection and validation requirements for each connection pathway;

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		The assumptions underpinning the recommended adoption of CSIP-AUS for inverters above 30 kVA. Western Power supports further consideration of CSIP-AUS above 30 kVA, but recommends DEED clarify the specific use case, including whether CSIP-AUS is intended to support communications, commissioning, compliance monitoring, control capability, data exchange, or removal of connection process steps. Western Power is not currently clear that CSIP-AUS would materially streamline connection assessment or remove connection steps for larger systems. Western Power also recommends that DEED consider whether complementary technical requirements for DER above 30 kVA should be incorporated into, or supported by, the ESM Rules and WEM Procedure framework. Western Power considers that any complementary technical requirements should be developed through collaborative engagement with implementation stakeholders, including Western Power, to ensure they are practical, scalable and aligned with the broader transition of relevant technical requirements from the Technical Rules framework. Clear technical requirements and accountabilities would provide a stronger foundation for a more efficient, standardised and scalable connection pathway.
5	Requirements to share network capacity	Western Power supports this proposal in principle, subject to further clarity on how any new requirements would interact with existing obligations and tools, including the NOM and Western Power's existing spatial capacity mapping capability. Distribution network capacity information is already made available through existing channels and Western Power recommends that any future obligations build on these existing tools rather than duplicate them. Existing channels include: - The annual NOM, which provides distribution feeder capacity forecasts; - The NCMT, which provides a spatial view of network capacity, with further enhancements underway to include additional distribution network information; - The iNOM, which provides a spatial view of NSS opportunities relating to current NCESS procurements. Western Power recommends that DEED clarify the specific use cases it is seeking to support through additional network capacity information. For example, network capacity information for new load connections, export hosting capacity for generation, and VPP/NSS opportunity information may require different datasets, assumptions, confidentiality settings, update frequencies and implementation effort. DEED should confirm the purpose and value of any historical capacity requirement before introducing an obligation. Historical capacity can be difficult to produce and interpret, as feeder configuration, augmentation, load forecasts and operational capacity can change over time. Any requirement should be supported by a clear use case, as historical data may not reliably indicate future connection feasibility without significant context.
6	Explore mechanisms for VPP operators to provide simple capacity data	Western Power supports further work to define VPPs and explore mechanisms for collecting simple capacity data to support safe network planning and operation. At present, Western Power's visibility of VPP capability is largely limited to VPPs providing NSS procured through the NCESS framework, where data exchange requirements are established through the relevant procurement and contractual processes.

#	Proposal	Comment
		Western Power is also progressively implementing Dynamic Operating Envelopes (DOEs) to support operation of the network within technical limits while enabling greater DER and VPP utilisation. Applying DOEs to individual NMIs within a VPP may enable higher flexible export limits where network conditions permit and support the delivery of NSS and other VPP services.
7	Tie Western Power requirements to share network capacity information with VPP opportunities	Western Power supports, in principle, the use of spatial mapping tools to communicate distribution network capacity and VPP opportunities, where this information supports clearly defined industry use cases and provides practical value to proponents. Western Power already provides network capacity and opportunity information through the iNOM and NCMT. Any future obligations should build on these tools, avoid duplication, align with stakeholder needs, and ensure benefits are proportionate to implementation and ongoing data management costs.