

EPNR Working Group
Outage Coordination Meeting 3

4 November 2026

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Acknowledgement



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Agenda

- Welcome and introductions
- Overview of feedback from last meeting
- Next Steps
- Competition law: coordination meetings and public benefit – advice required
- PNR Amendment Concept – for feedback and input

Welcome and Introductions



Purpose of Workshops

To provide information to Participants over intention and content of proposed **rule changes for planned outages**.

To provide opportunity for Participants to contribute to the codesign of the proposed rule changes and/or have opinions on the proposed rule changes transparently recorded.

To align on the need and content of a PNR change to accommodate implementation of:

1. a Risk Framework against which planned outages may be assessed by Participants and the ISO; and
2. criteria for inclusion of equipment that must be reported to the ISO if an outage of that equipment is planned by a Participant.

Desired Outcomes:

1. Agreed need for PNR change to improve outage coordination
2. Agreed structure/content for PNR change to improve outage coordination
3. Commencement of defining the next steps, such as risk framework construct and criteria for equipment inclusion

Key Assumptions of Rule Change

- No change to rule 5, Integrated Mining Networks
- No changes to the carve outs for Pluto Facility
- Needs to minimise need for ACCC authorisation to breach competition law

Competition law

Context

- Agreements between competitors and potential competitors can violate Australia's competition laws, e.g. *Competition and Consumer Act 2010 (Cth)*
- This can include "arrangements" and "understandings", as well as contracts
- Pilbara ISOCo and some other rules participants have *partial* and *conditional* protection under ACCC Authorisation AA1000666
- **But Pilbara ISOCo does not seek to rely on that protection in this meeting**

Rules for this meeting

- This meeting is to discuss possible rule changes
- **Do not discuss specific outages or other market conduct**
- **Do not disclose price or other commercially sensitive information including customer details**

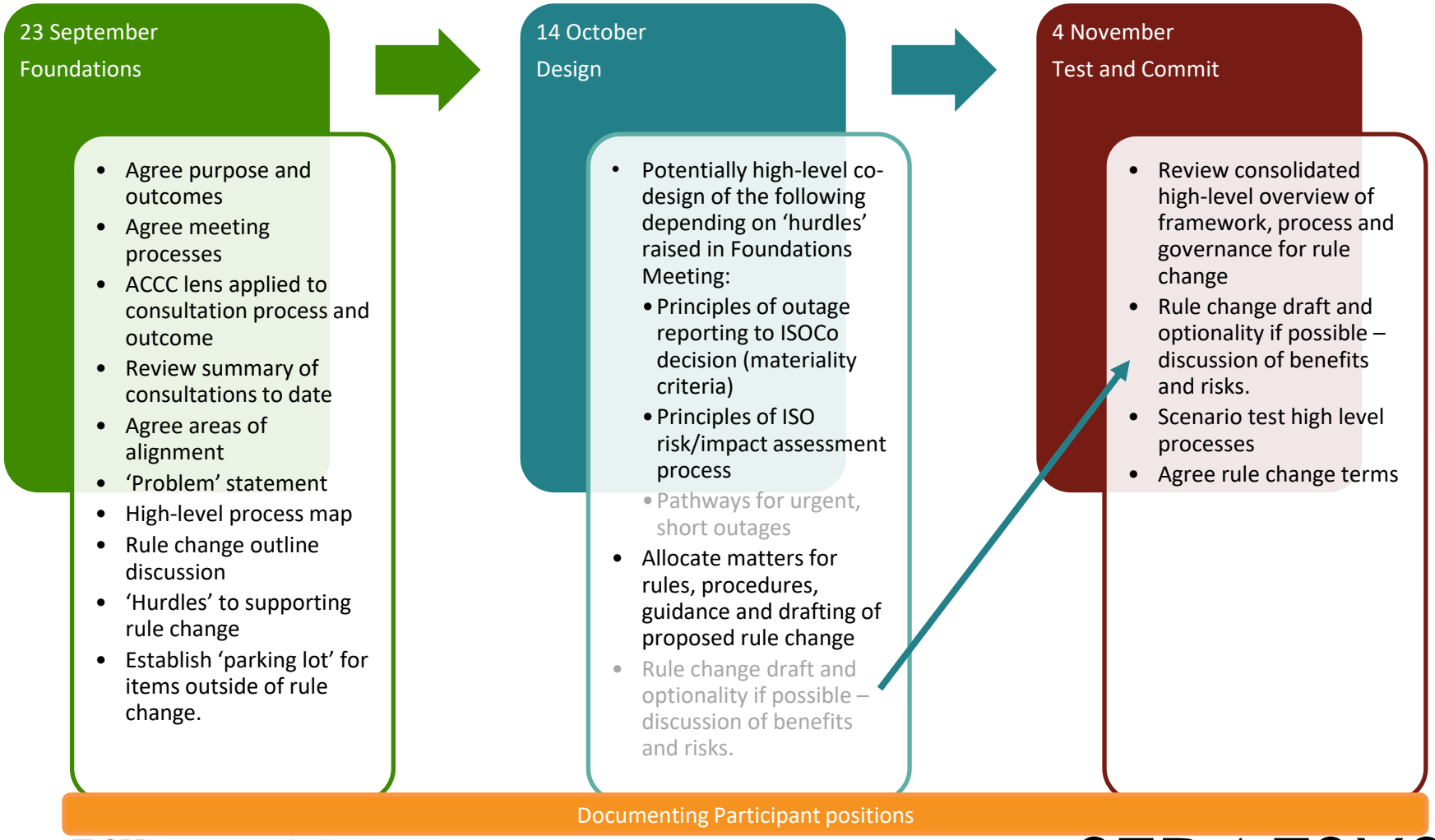
Be especially careful when discussing compensation. Keep it generic.

- If you have ringfencing obligations under the PNR, ensure you comply with them
- Ensure you comply with all obligations under the PNR regarding confidential and commercially sensitive information

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Overview of Designing Rule Change



Items not addressed in this workshop

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Feedback from Workshop 2



What we heard so far

Aligned

- Outage coordination underpinned by a NWIS risk appetite and standard assessment of material outages
- NSPs manage risk within own assets
- ISO role in outage coordination impacting other Registered Participants
- Detail of Risk Framework/Appetite is needed
- Transparent decisions and common templates
- Some risk on NWIS is acceptable that perhaps may not be on larger networks
- ISO role in outage scheduling and ESS actions
- Role of Frequency Operating Standard (HTR s2) and Planning Criteria (Rule 72)

Clarify

- Risk framework supporting resolution of modelling discrepancies (e.g. ISO v NSP differences)
- Urgent maintenance post storm/visual inspection
- ISO ability to approve/ decline outage plan versus direct appropriate action outside of NSP controls.
- Timeframes of outage notification requirements

Key Adjustments from Feedback

Outage List	The outage list has been condensed and limited in implementation.
Consultation and Objections	Consultation with affected participants is now limited and 'objection' influence on approval also limited.
Limited Coordination Role	ISO role limited to material PSSR impacts and other Participants are affected. PNR drafting encourages Participants to resolve outages within their own network. Outage Plan submission required in limited circumstances. Limited timeframe for ISO consideration. Limited reasons for rejection of Outage Plan.
Consistency	Outage Plans requirements will be clearly defined and templated. Consistent risk appetite will be applied by all Participants and ISO.
Urgency	Timeframes for ISO consideration limited. Process offered for urgent/opportunistic maintenance.

What happens after this meeting?



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Next Steps

The Pilbara ISO will

01 Collate feedback from Participants on the proposed rule architecture and design (across all 3 meetings), into a chapter of EPWA's Consultation Paper.

Participants may

02 Provide ISO written feedback up to 6 November 2026.

Provide written feedback on this and other rule changes to EPWA through the consultation paper and then Exposure Draft consultation process.

EPWA will/may

03 EPWA will run a public consultation process on "No regrets reforms", building on the Implementation Plan (Nov 25) and Consultation process (Feb 25).
An update on Outage Coordination work will be provided to the PAC meeting on 12 November 2026

04 Along with the Minister, may choose to accept, amend or reject the rule change proposed by Pilbara ISO based on feedback from Participants through consultation paper, the PAC and exposure draft consultation processes.

with consideration to the Pilbara Objectives

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Competition Law: Coordination Meetings and Public Benefit



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Public Benefit and Coordination Meetings

Current Position	Reliant on ACCC authorisation to manage competition law risk where vertically integrated NSP-Gentailers and other competitors coordinate, collaborate and share outage information under the Pilbara Networks Rules.
Direction of Change	Targeted PNR amendments to reduce competition risk would shift appropriate operational and administrative decisions to ISOCo, supported by transparent, proportionate stakeholder consultation. Intends to reduce ISO's reliance on ACCC authorization while preserving coordination and consultation for effective NWIS operation. NSP-Gentailers will likely still need some authorisation.
Coordination Consideration	The new outage coordination process proposed by this rule change removes the need for coordination meetings under Rule 174. Those meetings involve competition risk because they require competitor-to-competitor sharing of sensitive information and potentially illegal agreements.
Public Benefit Case	**Is there a public-benefit case for retaining coordination meetings?** Some stakeholders favoured retaining system coordination meetings despite the other reforms. If these meetings were kept, the authorisation renewal application would need to show a clear public benefit of keeping them, which outweighs the public detriment of their risk to competition – see Competition and Consumer Act, section 90(7). How might this case be made?

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PNR Amendment – Concept



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PNR Enablers of ISO Role

The Pilbara ISO needs the ability to

01 Establish, in consultation with Participants, a NWIS Risk Appetite for NWIS planned outages

02 Establish a standard process (risk framework) for application and assessment of risks in relation to NWIS planned outages that is applied to all outages which may create a material impact on the NWIS PSSR or impact the cost effectiveness of the NWIS.

03 Evaluate Participant application of the risk assessment and compliance with the risk.

04 Provide ISO with a coordination role with materially affected participants of outages and allows the ISO to determine proportionate changes to timing, sequencing or mitigation.

with consideration to the Pilbara Objectives

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Objective of PNR Rule Change

To establish a proportionate ISO coordination regime to manage material risks to PSSR to the NWIS while preserving Participant autonomy and limiting ISO coordination to unresolved cases materially affecting a Registered Participant, and to minimise the need for ACCC Authorisation wherever practicable

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Outage Coordination Rule Architecture

FOUNDATIONS Scoping, defining and filtering the Outage Coordination requirements and process

PURPOSE + APPLICATION
Sets objectives + scope. Participants remain responsible for own assets. Avoids duplication of existing technical, safety or planning obligations. Sets responsibilities in outage coordination.

DEFINITIONS
Core concepts e.g. Outage Plan, Outage Window, Material Change, Notifiable Activity, PSSR Risk, Affected Registered Participant, Materially Affected Request.

OUTAGE PLANNING LIST
Identifies facilities, equipment or activities that may materially affect PSSR and may require Notification or an Outage Plan. Defines process of changing this list.

Planning List application

PATHWAYS Application of the Outage Planning List determines Outage Planning Pathway

EXCLUDED
No ISO involvement

NOTIFIABLE
ISO assesses schedule risk

OUTAGE PLAN
ISO assessment

Coordination required

OUTAGE PLAN Requirements of Outage Requestor and ISO for Coordinated Pathway

PLAN

Specifies timing and minimum information of Outage Plan.

CONSULT

Direct, good-faith consultation with existing contracted parties who may be affected.

ASSESSMENT

Defines how ISO assesses Outage Plans for completeness, PSSR risk, mitigations, schedule conflicts, NWIS risk appetite

DECIDE

Requires ISO to decide ≤2 weeks. Unless material PSSR impact where ISO can approve with reasonable conditions or reject (limited).

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Outage Coordination Rule Architecture

SAFEGUARDS For Affected Participants, plan changes, information, compensation and procedures

MATERIALLY AFFECTED REQUESTS
Allows Affected Participant to seek ISO Coordination if not resolved in the consultation process and impacts are material and demonstrable.

→

ISO OUTAGE COORDINATION
Use the least-burdensome practicable change to timing, sequencing or mitigation.

OPPORTUNISTIC MAINTENANCE
Expedited process for unexpected maintenance opportunities that could not reasonably have been scheduled.

→

ISO COORDINATION
ISO may determine whether the request qualifies as urgent and assesses with regard to PSSR risk, impacts on other outages/Participants.

MONITOR, CHANGES + URGENT
Non-material updates allowed within outage window; revised Outage Plan for material change/ extension.

WITHDRAWAL + RECALL
Limits withdrawal/ recall to PSSR risk and requires prompt notice, reasons, and safe and practicable alternatives.

SCHEDULE + CONFIDENTIALITY
Requires ISO to maintain outage schedule and protect confidential information.

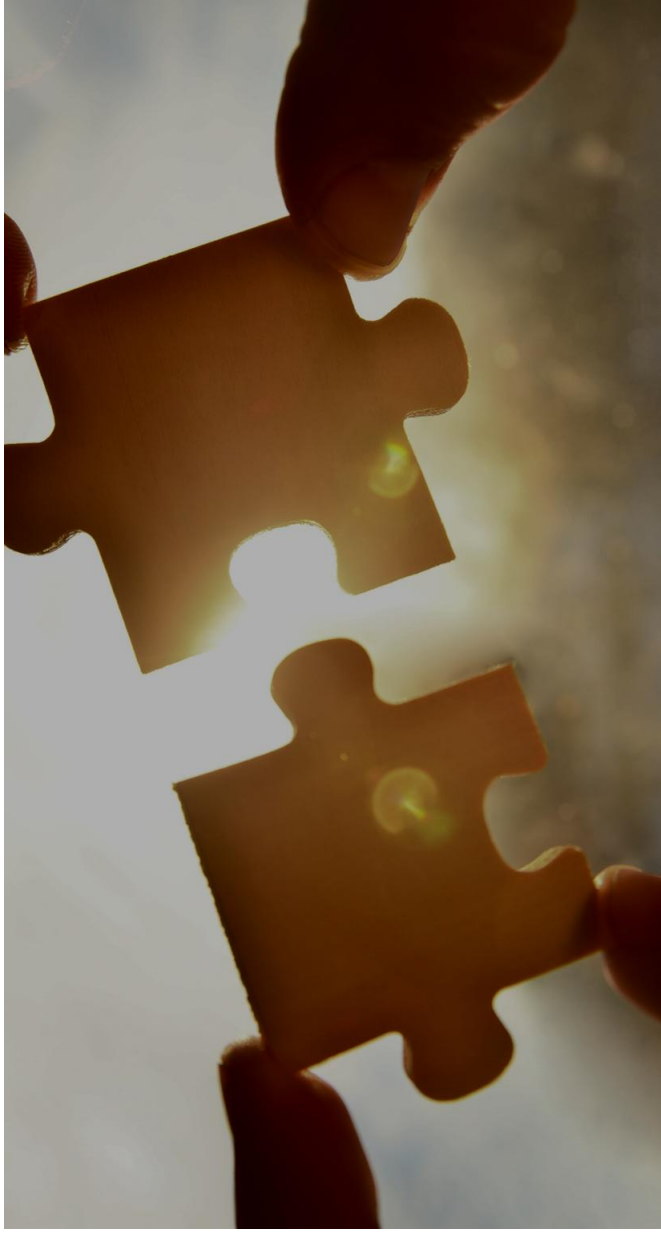
DISPUTES + COMPENSATION
Provides review and dispute rights of specific ISO decisions and provides compensation for late withdrawal or recall of ISO approval.

OUTAGE COORDINATION PROCEDURE
Detailed operational and administrative matters including lists, criteria, methodologies, templates, timeframes and expedited processes to be specified in a procedure.

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Key Concepts of the Outage Coordination Architecture



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Outage Planning List (Materiality Filter)

EVALUATES

Will this outage or activity have a functional impact on the NWIS PSSR?

DESIGN RESPONSE	Binary (yes/no) assessment.
PHILOSOPHY	**Not all outages require risk assessment.**

REASONING

AUTONOMY & RISK	Outage owner uses filter to decide whether an outage falls within the Outage Coordination requirements
SCOPE GUARDRAIL	Generation/storage facilities and their critical auxiliary systems can manage single point of failure activity.
CONTINUITY	Provides outage owners clearer guidance on whether an outage might credibly adversely impact PSSR and therefore require further assessment.

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Outage Risk Assessment

EVALUATES

If the residual risk of the outage is within the Risk Appetite of the NWIS

DESIGN RESPONSE	Assessment of PSSR risks caused by the outage and proposed mitigations
PHILOSOPHY	**Alignment of risk appetite in relation to NWIS PSSR**

REASONING

CONSISTENCY	Outage Requestors and ISO utilise the same assessment framework to evaluate risk appetite. ISO verifies assessment has been applied with due care.
SCOPE GUARDRAIL	Outcomes of the assessment determine ISO coordination requirements/potential. ISO must consult with Registered Participants on Outage Assessment Framework.

Materially Affected Participant Request

EVALUATES

If a Materially Affected Party has not been adequately consulted/can not reach agreement with Outage Requestor

DESIGN RESPONSE	Allows an affected Registered Participant to seek ISO coordination if direct engagement with Outage Requestor has failed and there is demonstrable material impact.
PHILOSOPHY	**Provides Participant pathways to outage Coordination**

REASONING

FAIRNESS	Materially affected parties have autonomy in approach to outage coordination.
SCOPE GUARDRAIL	Materially Affected Registered Participant must demonstrate failure to reach agreement and direct, material impacts.



Thank you

Please provide feedback on how things went today:
https://form.menti.com/s/aldkp5puhhda

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Outage Coordination Rule Architecture Overview

Objective: To establish a proportionate ISO coordination regime to manage material risks to PSSR to the NWIS while preserving Participant autonomy and limiting ISO coordination to unresolved cases materially affecting a Registered Participant, and to minimise the need for ACCC Authorisation wherever practicable.

1. Purpose and Application

Establishes the objectives and scope of the regime, preserves each Rule's Participant responsibility for its own assets and obligations, and limits ISO's involvement to matters requiring coordination to manage material PSSR risks.

2. Definitions

Defines the three regulatory pathways (Excluded, Notifiable, Coordinated) and the core concepts required to apply and administer the outage coordination regime, including: Outage Plan, Outage Window, Material Change, Affected Registered Participant and Materially Affected Request. These terms are indicative and may be refined as the Rules are drafted.

3. Outage Planning List

Identifies the classes of facilities, equipment and activities whose outage, testing or commissioning may materially affect PSSR and therefore require an Outage Plan. Replaces the previously discussed concept of 'Equipment List'. Requires Participants to apply the Outage Planning List and provides the process of changing the Outage Planning List.

4. Regulatory Pathways

Establishes three pathways for Planned Outages:

- **Excluded Outages** require no ISO involvement;
- **Notifiable Outages** require notification to the ISO and are subject to limited ISO checks, including for scheduling conflicts, but do not require ISO approval; and
- **Coordinated Outages** require an Outage Plan and assessment by the ISO under the applicable outage assessment framework.

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5. Outage Plan Requirements

Specifies submission timing and minimum information required in an Outage Plan, including the proposed outage, PSSR risks, proposed mitigations, affected Registered Participants, outage window and recall capability.

6. Consultation with Registered Participants

Permits the Outage Requestor, before submitting an Outage Plan, to consult with Registered Participant with whom it has an existing contractual arrangement (e.g. for an NSP, users of its network) who are reasonably expected to be materially affected. The parties must use reasonable endeavours to address concerns through their existing contractual and operational arrangements.

Where a potentially affected Registered Participant does not have a relevant contractual relationship with the Outage Requestor, consultation is facilitated by the ISO, limiting the need for direct interaction between Participants where competition or confidentiality concerns may arise.

Consultation does not give an affected Registered Participant a right to prevent or veto the Planned Outage.

7. Outage Assessment Framework

Establishes a consistent framework for assessing Outage Plans, including PSSR risks, mitigation, residual risk, the applicable NWIS risk appetite and scheduling conflicts.

The framework is developed and amended in consultation with Registered Participants and set out in the Outage Coordination Procedure.

8. ISO Decision on an Outage Plan

Requires the ISO to approve an Outage Plan unless, after applying the Outage Assessment Framework, the Planned Outage would result in a material PSSR risk. Conditions must be reasonable and proportionate, and rejection is limited to circumstances where the risk cannot reasonably be brought within the applicable NWIS risk appetite through mitigation or conditions.

9. Materially Affected Requests

Allows a Registered Participant that considers it is materially affected by a Planned Outage to request ISO involvement where the issue has not been resolved through the applicable consultation process. The Participant must demonstrate a direct and material impact before the ISO is required to undertake further coordination.

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10. ISO Outage Coordination

Where the ISO determines that a Registered Participant is materially affected by a Planned Outage, allows the ISO to determine proportionate changes to timing, sequencing or mitigation only to the extent necessary to address the unresolved material impact, using the least burdensome reasonably practicable response.

11. Opportunistic Maintenance

Provides an expedited process where an unexpected opportunity arises to undertake maintenance or other planned work that could not reasonably have been scheduled through the ordinary outage planning process. The ISO may determine whether the request qualifies and assess it having regard to PSSR risk, impacts on other outages or Participants, available time and resources.

12. Ongoing Monitoring, Changes and Urgent Outages

Requires ongoing monitoring of approved Outage Plans, permits non-material updates within the approved Outage Window, requires revised or new Outage Plans for Material Changes or extensions, and provides an expedited process for Urgent Outages.

13. Withdrawal of Approval and Recall of Outage

Limits the ISO's ability to withdraw approval or recall an outage to circumstances where this is necessary to address a PSSR risk, with requirements for prompt notice, reasons and consideration of safe and reasonably practicable alternatives.

14. NWIS Outage Schedule and Confidentiality

Requires the ISO to maintain and publish a current NWIS Outage Schedule and make specified information available to Registered Participants, while limiting access, use and disclosure of confidential, commercially sensitive and security-sensitive information. Additional information may be disclosed where necessary to assess or manage a direct and material outage impact.

15. Disputes and Compensation

Provides review rights for specified ISO decisions and compensation arrangements where approval is withdrawn shortly before commencement or an outage is recalled.

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16. Outage Coordination Procedure

Requires detailed operational and administrative matters, including lists, criteria, methodologies, templates, timeframes, expedited processes, information-sharing arrangements and claims administration, to be specified in the Outage Coordination Procedure.

NOTES:

Central drafting distinction: The Outage Planning List determines whether an Outage Plan is required; the PSSR assessment determines whether ISO must approve the plan; and the materially affected test determines whether ISO coordination of cross-participant impacts is required.

Sources: EPNR Working Group meeting 1 of 23 September 2026; EPNR Working Group meeting 2 of 14 October 2026; Draft Implementation Plan section 3.10; Pilbara Networks Rules dated 18 June 2025; and Electricity System and Market (ESM) Rules dated 1 October 2026. Rule numbering and cross-references remain illustrative.

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Outage Coordination – Rule Drafting Instructions

Drafting Objective: To establish a proportionate ISO coordination regime to manage material risks to PSSR to the NWIS while preserving Participant autonomy and limiting ISO coordination to unresolved cases materially affecting a Registered Participant, and to minimise the need for ACCC Authorisation wherever practicable.

Purpose and Application

What it does:	Establishes the objectives and scope of the regime, preserves each Rule's Participant responsibility for its own assets and obligations, and limits ISO's involvement to matters requiring coordination to manage material PSSR risks.
Why it is needed:	Defines what the regime is intended to achieve, who it applies to and the boundaries of the ISO's role.
Key Working Group Feedback:	• The regime should facilitate, rather than unnecessarily constrain, maintenance. • Rules Participants should remain responsible for their own facilities and obligations. • The role of planning criteria in outage coordination should be clear. • ISO involvement should be limited to material risks requiring coordination.
Sources:	• Working Group meeting 1 – slides 11-13, 21 • Working Group meeting 2 – slides 5-6, 13, 15-16, 18-20. • PNR – Pilbara Electricity Objective, System Security Objective, HTR and planning criteria provisions; rule 182(3) for Pluto.

Drafting Instruction
The purpose of this section is to establish, having regard for the Pilbara Electricity Objective and the System Security Objective, a proportionate framework for outage coordination, that: • facilitates timely and efficient maintenance, testing and commissioning • preserves the responsibility of each Rules Participant for the planning, safety, maintenance and operation of its own facilities and equipment • provides for notification to the ISO of selected Planned Outages; • provides for assessment of Planned Outages that have the potential to materially impact Power System Security and Reliability; and • provides for ISO coordination of impacts between Registered Participants upon receiving a Materially Affected Request.
Applies to a Planned Outage, testing or commissioning activity that: • relates to a facility, equipment or activity within the NWIS; and

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Drafting Instruction

- falls within a class or criterion specified in the Outage Planning List or the Outage Coordination Procedure.

This will not:

- transfer responsibility for a facility or item of equipment to the ISO;
- relieve a Rules Participant from an obligation under the PNR, the Harmonised Technical Rules or another applicable law or instrument;
- relieve a Rules Participant from any obligation arising under a contract or other agreement to which it is a party;
- displace an NSP's responsibility to apply its planning criteria, any conditions of its electricity retail license or any obligation under the PNAC; or
- require the ISO to approve the method by which a Rules Participant undertakes maintenance, testing or commissioning.

A Rules Participant remains responsible for undertaking any applicable planning-criteria assessment, Harmonised Technical Rules assessment, safety assessment, customer consultation and internal approval process before submitting an Outage Plan.

Definitions

What it does:	Defines the three regulatory pathways (Excluded, Notifiable and Coordinated) and the core concepts required to apply and administer the outage coordination regime, including: Outage Plan, Outage Window, Material Change, Affected Registered Participant and Materially Affected Request. These terms are indicative and may be refined as the Rules are drafted.
Why it is needed:	To ensure terms used in the Rules are clear and consistently applied by all Rules Participants.
Sources:	• PNR – Subchapter 7.1. • Electricity System and Market Rules (ESM Rules) section 3.18 Outages.

Drafting Instruction

Define: Affected Registered Participant, Coordinated Outage, Material Change, Notifiable Activity, Outage Plan, Outage Requestor, Outage Window, PSSR Risk, Recall Time, Risk Framework, Scheduling Conflict and Urgent Outage.

Review definitions of: Outage, Notifiable Event and System Coordination Matters.

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Outage Planning List

What it does:	Identifies the classes of facilities, equipment and activities whose outage, testing or commissioning may materially affect PSSR and therefore require an Outage Plan. Replaces the previously discussed concept of 'Equipment List'. Requires Participants to apply the Outage Planning List and provides the process of changing the Outage Planning List.
Why it is needed:	To provide a screening mechanism that limits the application of the outage coordination process to activities with the potential to materially affect PSSR, allowing other outages to be managed without full ISO coordination.
Key Working Group Feedback:	• The equipment list should apply a materiality threshold and avoid capturing every equipment outage. • The approach should be targeted and proportionate, avoiding an overly granular or administratively burdensome list. • Inclusion should focus on the functional impact of an outage or activity, with the list operating as a screening mechanism rather than the risk assessment itself. • The criteria and principles should be established in the Rules, while the detailed list should remain sufficiently flexible to be refined through the Procedure.
Sources:	• Working Group meetings 1 and 2, including discussion of the scope and materiality of the equipment list and the subsequent move towards a functional-impact screening approach. • Evolution of the Pilbara Network Rules – Draft Implementation Plan, section 3.10, which proposes an Outage Planning List covering facilities whose outages have the potential to materially impact PSSR, with facilities outside the List potentially subject to notification only. Section 3.10.2 also identifies development of criteria for the outage equipment list and a procedure to assist Participants to identify outage impacts. • ESM Rules, section 3.18A, Equipment List and Self-Scheduling Outage Facilities.

Drafting Instruction
The ISO must maintain an Outage Planning List for the purpose of identifying facilities, equipment and activities for which a Planned Outage has the potential to materially impact Power System Security and Reliability. The criteria for inclusion on the Outage Planning List must be specified in the Outage Coordination Procedure. The criteria for inclusion must be designed so that the Outage Planning List captures only Facilities, equipment and activities for which an outage, testing or commissioning activity may reasonably require assessment or coordination by the ISO having regard to Power System Security and Reliability.

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The criteria for inclusion in the Outage Planning List may have regard to whether an outage, testing or commissioning activity could result in:

- a loss of functionality relevant to Power System Security and Reliability;
- a loss of redundancy that creates or materially increases the risk of a single point of failure;
- an increased risk to Power System Security and Reliability associated with testing or commissioning;
- a reduction in the availability or delivery of an Essential System Service;
- a loss or material reduction of transmission voltage control;
- a material reduction in visibility, communications or control required by the ISO Control Desk to perform its functions;
- an impact on an interconnection between Registered Networks; or
- another material impact on Power System Security and Reliability specified in the Outage Coordination Procedure.

Minimum Scope of Outage Planning List

Subject to the criteria for inclusion in the Outage Planning List, the Outage Planning List must provide for the inclusion of:

- transmission Network Elements of covered networks including lines, circuit breakers, isolators, busbars and transformers;
- equipment required to operate an interconnection between Registered Networks;
- equipment necessary to provide or deliver Essential System Services;
- equipment necessary to maintain transmission voltage control;
- equipment necessary to provide the ISO Control Desk with system visibility, communications or control required to perform its functions;
- Registered Facilities meeting any capacity threshold specified in the Outage Coordination Procedure;
- equipment associated with a Registered Facility where an outage could create a single point of failure of the Facility or a Generating Unit;
- testing or commissioning activities that could materially affect Power System Security and Reliability; and
- any other Facility or equipment which the ISO determines must be subject to outage planning to maintain Power System Security and Reliability.

Application of Outage Planning List

Before undertaking a Planned Outage, testing or commissioning activity, a Rules Participant must determine whether the relevant Facility, equipment or activity falls within a class or criterion specified in the Outage Planning List.

A Rules Participant must make the determination:

- reasonably;

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Drafting Instruction

- having regard to the reasonably foreseeable consequences of the activity;
- in accordance with the Outage Coordination Procedure; and
- in accordance with GEIP.

Effect of Inclusion on Outage Planning List

Inclusion of a facility, equipment or activity on the Outage Planning List:

- requires the relevant Planned Outage, testing or commissioning activity to be planned and assessed in accordance with this Subchapter; but
- does not of itself establish that:
- the activity will materially impact Power System Security and Reliability;
- another Registered Participant is materially or materially affected; or
- coordination between Registered Participants by the ISO under rule [ISO Coordination] is required.

ISO coordination of impacts between Registered Participants may be undertaken where:

- an Affected Registered Participant has made a request in accordance with rule [Affected Participant Request]; and
- the ISO determines in accordance with that rule that the affected Registered Participant would be materially affected.

Nothing in this rule limits the ISO's powers under this Subchapter to assess an Outage Plan, impose conditions on an approval, reject an Outage Plan, or exercise its powers in relation to a Scheduling Conflict.

Review and Amendment of Outage Planning List

The Outage Planning List must be contained in the Outage Coordination Procedure.

A Rules Participant, including the ISO, may propose an amendment to the Outage Planning List where it is reasonably considered that the amendment is necessary to ensure that the List appropriately identifies Facilities, equipment or activities that have the potential to materially impact Power System Security and Reliability.

An amendment to the Outage Planning List must be made in accordance with the Procedure Change Process in Sub-Appendix 2.3.

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In proposing an amendment, the ISO must have regard to: • the materiality of the potential impact on Power System Security and Reliability; • the frequency with which the relevant activity occurs; • the regulatory and administrative burden resulting from inclusion; • whether notification without full outage planning would adequately manage the relevant risk; • any relevant operational experience; and • the Pilbara Electricity Objective.

Regulatory Pathways

What it does:	Establishes three pathways for Planned Outages: • **Excluded Outages** require no ISO involvement; • **Notifiable Outages** require notification to the ISO and are subject to limited ISO checks, including for scheduling conflicts, but do not require ISO approval; and • **Coordinated Outages** require an Outage Plan and assessment by the ISO under the applicable outage assessment framework.
Why it is needed:	To provide a proportionate process for different types of outages and limit ISO involvement to the level necessary to manage PSSR risks and interactions between outages.
Key Working Group Feedback:	• Most outages should proceed with minimal ISO involvement, with Participants retaining responsibility for managing their own outages. • Notifiable Outages should remain visible to the ISO so scheduling conflicts can be identified. • ISO involvement should be limited to circumstances requiring additional mitigation or coordination under clear decision rules.
Sources:	• Working Group meetings 1 and 2, including discussion of Participant autonomy, limiting unnecessary ISO involvement, the differentiated outage pathways, and retaining scheduling conflict checks for Notifiable Outages.

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- Evolution of the Pilbara Network Rules – Draft Implementation Plan, section 3.10, which contemplated a centralised outage coordination process while allowing outages outside the Outage Planning List to be notified to the ISO for information only.
- ESM Rules, section 3.18, as a comparative framework for differentiated outage pathways.

Drafting Instruction
Outage Planning Pathways A Rules Participant proposing a Planned Outage must determine, in accordance with these Rules and the Outage Coordination Procedure, whether the Planned Outage is: • an Excluded Outage; • a Notifiable Outage; or • an Outage Plan, subject to the outage planning and coordination requirements of this Subchapter. A Rules Participant must make the determination of the Outage Planning Pathway reasonably and in accordance with the criteria specified in the Outage Coordination Procedure.
Excluded Outages A Planned Outage is an Excluded Outage where: • the relevant Facility, equipment or activity is not included on the Outage Planning List; and • the Outage Coordination Procedure does not require notification of the Planned Outage to the ISO. An Excluded Outage is not subject to notification, assessment or approval by the ISO under this Subchapter and may be managed internally by the Rules Participant.
Notifiable Outages A Planned Outage is a Notifiable Outage where: • the relevant Facility or equipment is not included on the Outage Planning List; and • the Outage Coordination Procedure requires the Planned Outage to be notified to the ISO for information purposes. A Rules Participant must notify the ISO of a Notifiable Outage: • as soon as practicable; and • in accordance with the information requirements and timeframes specified in the Outage Coordination Procedure.

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On receiving notification of a Notifiable Outage, the ISO must review the notification to:

- confirm that the notification contains the information required under the Outage Coordination Procedure;
- identify any conflict with another Planned Outage or other activity included in the NWIS outage schedule; and
- undertake any other action specified in the Outage Coordination Procedure in relation to a Notifiable Outage.

Where the ISO identifies a Scheduling Conflict involving a Notifiable Outage, the ISO may take the action specified in the Outage Coordination Procedure.

The ISO may include a Notifiable Outage in the NWIS outage schedule.

Outage Plan Requirements

What it does:	Specifies submission timing and minimum information required in an Outage Plan, including the proposed outage, PSSR risks, proposed mitigations, affected Registered Participants, outage window and recall capability.
Why it is needed:	To provide a consistent and proportionate information base for assessing planned outages, while ensuring Participants provide sufficient information to identify and manage relevant PSSR risks.
Key Working Group Feedback:	• Outage Plan requirements should be standardised and transparent, while avoiding unnecessary administrative burden. • Participants should identify relevant PSSR risks and apply mitigations within their control before further ISO involvement is required. • The requirements should support Participant autonomy and enable maintenance to proceed where risks are appropriately managed.
Sources:	• Working Group meetings 1 and 2, including discussion of standard Outage Plan requirements, Participant responsibility for risk assessment and mitigation, and the information needed to support a proportionate outage process. • Evolution of the Pilbara Network Rules – Draft Implementation Plan, section 3.10, which establishes the principle that Outage Plans for network outages affecting PSSR must identify how the PSSR impact will be mitigated. • ESM Rules, section 3.18B, as a comparative source for outage plan requirements.

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Submission of Outage Plan

An Outage Requestor must submit an Outage Plan:

- as soon as practicable after identifying the need for the Planned Outage; and
- where the Planned Outage forms part of a planned or recurring maintenance program, no later than one year before the proposed commencement of the Planned Outage, unless a different timeframe applies in accordance with the Outage Coordination Procedure.

The Outage Coordination Procedure may specify:

- the classes of Planned Outage to which particular submission timeframes apply;
- circumstances in which an Outage Plan may be submitted after the otherwise applicable submission timeframe; and
- an expedited submission process for an Urgent Outage.

Content of Outage Plan

An Outage Plan must include:

- the Facility and equipment affected;
- the purpose and scope of the Planned Outage with sufficient detail to enable assessment in accordance with the Outage Assessment Framework;
- the proposed commencement and completion times;
- the proposed Outage Window;
- the expected time required to return the Facility or equipment to service if recalled;
- relevant operating configurations, concurrent outages and prerequisite activities;
- each material PSSR risk reasonably identified by the Outage Requestor;
- the likelihood and consequence of each identified PSSR risk, assessed in accordance with the Outage Assessment Framework;
- each proposed mitigation;
- each Registered Participant consulted by the Outage Requestor in accordance with [Consultation with affected participants rule] and any unresolved material issue;
- any information claimed to be confidential; and
- any other information specified in the Outage Coordination Procedure.

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Information Relevant to Compensation An Outage Requestor may, when submitting an Outage Plan or at any later time specified in the Outage Coordination Procedure, provide information concerning: • any material commitment entered into, or proposed to be entered into, for the purposes of carrying out the Planned Outage, including the timing of the engagement of contractors or consultants; and • the nature and timing of any material costs or liabilities that may arise if the Planned Outage is cancelled, deferred, recalled or materially varied. A Registered Participant is not entitled to compensation in respect of a cost or liability arising from such a commitment to the extent that the information required under this rule was not provided within the applicable timeframe. The Outage Coordination Procedure may specify the form, content and timeframe for providing information under this rule.

Consultation with Affected Participants

What it does:	Permits the Outage Requestor, before submitting an Outage Plan, to consult with Registered Participant with whom it has an existing contractual arrangement (e.g. for an NSP, users of its network) who are reasonably expected to be materially affected. The parties must use reasonable endeavours to address concerns through their existing contractual and operational arrangements. Where a potentially affected Registered Participant does not have a relevant contractual relationship with the Outage Requestor, consultation is facilitated by the ISO, limiting the need for direct interaction between Participants where competition or confidentiality concerns may arise. Consultation does not give an affected Registered Participant a right to prevent or veto the Planned Outage.
Why it is needed:	To provide a proportionate mechanism for identifying and addressing material outage impacts while preserving existing contractual arrangements and Participant responsibility for their own outages (this will also involve managing their own competition law risks). The distinction between direct consultation through existing contractual relationships and ISO-facilitated consultation in other cases also limits unnecessary direct interaction between Participants where competition

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	risks may arise. This allows concerns to be identified and, where practicable, resolved before progressing through the Materially Affected Request process.
Key Working Group Feedback:	• Consultation should be targeted and proportionate and should not give an affected Participant a right to prevent another Participant undertaking its planned maintenance. Minutes from the September WG records concerns that further consultation could enable customers to object to agreed outages after contractors had been committed. • Participants emphasised existing contractual arrangements and established outage coordination arrangements should be recognised. • Competition risk is an important design consideration. Coordination between competitors is one of the key risks the regime needs to address. The proposed reforms are seeking to minimise the need for ACCC authorisation.
Sources:	• Working Group meetings 1 and 2, including discussion of Participant autonomy, existing outage planning and contractual arrangements, concerns about additional consultation interfering with planned maintenance, coordination between competitors, and the objective of minimising reliance on ACCC authorisation. • Draft Implementation Plan, section 3.10, which provides that Outage Requestors must consult with affected parties before submitting outage requests to the ISO. • ESM Rules, section 3.18C.2 as a comparative source for consultation with affected facilities.

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Consultation before Submission

Before submitting an Outage Plan, an Outage Requestor must, to a GEIP standard, consult each Registered Participant:

- with whom the Outage Requestor has an existing contractual arrangement relevant to the Planned Outage; and
- that the Outage Requestor reasonably considers may be materially affected by the Planned Outage.

For the purposes of the above, the Outage Requestor must provide the Registered Participant with:

- sufficient information to understand the proposed timing and duration of the Planned Outage and its reasonably foreseeable operational impact on the Registered Participant;
- details of any proposed mitigations relevant to that Registered Participant; and
- a reasonable opportunity to respond.

The Outage Requestor is not required to provide:

- information that is not reasonably necessary for the purposes of the consultation;
- commercially sensitive information unrelated to the impact; or

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- information where disclosure is prohibited under these Rules or another applicable law.

The Outage Requestor must consider in good faith feedback provided by a Registered Participant consulted under this section.

Consultation under this section does not require the Outage Requestor to obtain the agreement of a Registered Participant.

Nothing in this section requires an Outage Requestor to consult directly with a Registered Participant with whom it does not have an existing contractual arrangement of the kind referred to in [rule reference] or to consult where doing so would be unlawful. If the Outage Requestor cannot itself reasonably or lawfully undertake consultation, it may request the ISO to assist in consultation. The ISO may determine whether, and if so to what extent, in what manner and on what terms it will provide such assistance.

Resolution of Concerns
Where the Outage Requestor and a Registered Participant have an existing contractual arrangement relevant to the Planned Outage, they must use reasonable endeavours to address any concern raised by that Registered Participant before the Registered Participant submits a Materially Affected Request under [rule reference].

Reasonable endeavours may include consideration of:

- changes within the proposed Outage Window;
- changes to the duration or sequencing of the Planned Outage;
- additional reasonable mitigation within the Outage Requestor's control; and
- operational arrangements within the Registered Participant's control.

Outage Assessment Framework

What it does: Establishes a consistent framework for assessing Outage Plans, including PSSR risks, mitigation, residual risk, the applicable NWIS risk appetite and scheduling conflicts.

The framework is developed and amended in consultation with Registered Participants and set out in the Outage Coordination Procedure.

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Why it is needed:	To provide a uniform and transparent basis for assessing outage risks and determining whether further mitigation or ISO involvement is required. Provides a consistent assessment Framework for Outage Requestors and the ISO.
Key Working Group Feedback:	• Participants supported a common risk framework to provide greater consistency in identifying, assessing and mitigating outage risks. • The framework should recognise that some level of risk is unavoidable and enable necessary maintenance rather than seeking to eliminate all risk. • The applicable risk appetite and assessment criteria need to be clear, transparent and developed with Participants, particularly where different Participants may have different risk tolerances.
Sources:	• Working Group meetings 1 and 2, where the concept was discussed as a common risk assessment framework, including the need for an agreed approach to assessing risks and controls, a common or defined risk appetite, assessment of residual risk after mitigation, and clear criteria for when ISO intervention may be required. • Working Group 2, which provided an indicative Risk Framework involving identification and rating of PSSR risks, assessment of likelihood and consequence, identification of controllable mitigations and escalation where residual risk remained above the proposed threshold. • Draft Implementation Plan, section 3.10, which proposes that the ISO assess outages against an assessment framework developed in consultation with connected parties, and separately identifies development and consultation on an outage coordination process, including a risk framework, as an implementation action. • ESM Rules, section 3.18E, as a comparative source for outage assessment.

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Outage Assessment Framework

The ISO must assess Outage Plans in accordance with the Outage Assessment Framework set out in the Outage Coordination Procedure.

The Outage Assessment Framework must:

- be developed and amended after appropriate consultation with Registered Participants;
- establish a consistent method and give guidance for identifying and assessing PSSR risks arising from a Planned Outage;
- specify the applicable NWIS risk appetite and the criteria or thresholds for determining whether a PSSR risk is within that risk appetite;
- provide for assessment of the likelihood, consequence and duration of a PSSR risk and the effectiveness of available mitigation;
- provide for the assessment of residual PSSR risk after reasonably practicable mitigation has been taken into account; and
- provide for consideration of scheduling conflicts and concurrent outages.

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For the purposes of this Subchapter, the materiality of a PSSR risk must be determined in accordance with the Outage Assessment Framework, having regard to the applicable NWIS risk appetite.

Scope of ISO Assessment

In assessing an Outage Plan, the ISO must consider:

- whether the Outage Plan is complete;
- whether relevant PSSR risks have been identified;
- the likelihood, consequence and duration of each material PSSR risk;
- the effectiveness and availability of proposed mitigations;
- residual PSSR risk after mitigation;
- relevant concurrent outages and scheduling conflicts;
- whether any Registered Participant other than a Registered Participant consulted by the Outage Requestor may be materially affected by the Planned Outage;
- any requirement for Essential System Services or application of a new or existing Constraint Rule; and
- any other matter specified in the Outage Assessment Framework.

Other Potentially Affected Registered Participants

Where the ISO considers that a Registered Participant other than a Registered Participant consulted under [rule reference] may be materially affected by the Planned Outage, the ISO must determine whether information from, or consultation with, that Registered Participant is reasonably required to assess the Outage Plan.

Where the ISO determines that further information or consultation is required:

- the ISO must obtain the information or undertake the consultation necessary for its assessment;
- any information disclosed to the Registered Participant must be limited to information reasonably necessary for that Registered Participant to understand and respond to the potential impact of the Planned Outage; and
- the ISO must have regard to the confidentiality and commercial sensitivity of information in determining the information to be disclosed.

Where the ISO identifies under [rule] a Registered Participant that does not have an existing contractual arrangement with the Outage Requestor relevant to the Planned Outage, or has such an arrangement but reasonably considers it might be unlawful to endeavour to resolve the issue by direct consultation under that arrangement:

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- the Registered Participant may raise a concern about the Planned Outage with the ISO; and
- the ISO must consider the concern as part of its assessment of the Outage Plan and may seek further information from the Outage Requestor or the Registered Participant as reasonably required.

Nothing in this section requires the ISO to facilitate direct consultation between an Outage Requestor and a Registered Participant with whom the Outage Requestor does not have an existing contractual arrangement relevant to the Planned Outage, or where it would be unlawful for direct consultation to occur.

Requests for Further Information
The ISO may request information reasonably required to assess an Outage Plan.

A request for information must:

- identify the information required;
- explain why the information is relevant;
- be proportionate to the nature and materiality of the potential PSSR risk; and
- specify a reasonable response time.

ISO Decision on an Outage Plan

What it does:	Requires the ISO to approve an Outage Plan unless, after applying the Outage Assessment Framework, the Planned Outage would result in a material PSSR risk. Conditions must be reasonable and proportionate, and rejection is limited to circumstances where the risk cannot reasonably be brought within the applicable NWIS risk appetite through mitigation or conditions.
Why it is needed:	To provide a clear and constrained approval threshold, addressing concerns about broad ISO discretion to approve or reject outages while ensuring material PSSR risks are appropriately managed.
Key Working Group Feedback:	• Participants raised concerns about giving the ISO a broad role in approving or rejecting outages and supported Participants retaining responsibility for their own outages. • Participants supported clear decision criteria based on an agreed risk framework and acceptable risk level, with ISO intervention occurring where risks cannot be adequately managed.

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	• The specific two-week decision timeframe was not discussed with the Working Group and is included as a placeholder, based on the Draft Implementation Plan.
Sources:	• Working Group meetings 1 and 2, including concerns about an ISO approval role and support for Participant responsibility, clear decision-making criteria, an agreed risk framework and limiting ISO intervention to circumstances where risk cannot be managed to the agreed level. The October minutes show support for NSPs retaining the right to approve their outages and discussion of ISO intervention where risks could not be managed within the NWIS risk appetite. • Draft Implementation Plan, section 3.10, which proposed that the ISO approve an Outage Plan unless doing so would have a material impact on PSSR, determine whether to approve or reject the plan within two weeks of receipt, and assist the Outage Requestor to resubmit an acceptable plan following rejection. The two-week period has been retained as a placeholder and was not specifically discussed through the Working Group process.

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Decision Timeframe

Within two weeks after receiving a complete Outage Plan, the ISO must:

- approve the Outage Plan;
- approve the Outage Plan subject to conditions; or
- reject the Outage Plan.

An Outage Plan is complete when the ISO has received the information required by these Rules and the Outage Coordination Procedure.

If the ISO considers that an Outage Plan is incomplete, the ISO must, as soon as practicable after receiving the Outage Plan:

- notify the Outage Requestor that the Outage Plan is incomplete; and
- identify the additional information required to complete the Outage Plan.

The two-week period does not commence while an Outage Plan is incomplete. If the Outage Requestor provides additional information in response to a notice under this rule, the two-week period commences when the ISO has received all information required to complete the Outage Plan.

Approval Threshold

The ISO must approve an Outage Plan unless, after applying the Outage Assessment Framework, the ISO reasonably considers that the Planned Outage would result in a material impact on Power System Security and Reliability.

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The ISO may approve an Outage Plan subject to conditions where the ISO reasonably considers that the conditions:

- are necessary to avoid or mitigate a material PSSR impact identified in accordance with the Outage Assessment Framework;
- are reasonably practicable;
- are proportionate to the likelihood, consequence and duration of the PSSR risk; and
- represent the least burdensome reasonably practicable means of bringing the residual PSSR risk within the applicable NWIS risk appetite.

A condition may relate to:

- the timing or duration of the Planned Outage;
- implementation of a specified mitigation;
- environmental conditions
- monitoring or reporting during the Planned Outage;
- recall or return-to-service capability; or
- another matter directly related to the identified PSSR risk.

Rejection and Resubmission

The ISO may reject an Outage Plan only where:

- after applying the Outage Assessment Framework, the ISO reasonably considers the Planned Outage would result in a material PSSR risk;
- that risk cannot reasonably be brought within the applicable NWIS risk appetite through conditions or mitigation; or
- the information required to assess the material PSSR impact has not been provided.

If the ISO rejects an Outage Plan, the ISO must:

- provide written reasons;
- identify the material PSSR impact;
- identify any reasonably practicable change or mitigation that may enable approval;
- identify an alternative Outage Window, where reasonably practicable; and
- provide reasonable assistance to the Outage Requestor to resubmit an acceptable Outage Plan.

Effect of Approval

Approval of an Outage Plan:

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• confirms only that the Planned Outage satisfies the requirements of this Subchapter on the information available to the ISO; • does not constitute approval of the technical method, safety or prudence of the work; • does not transfer responsibility for the Facility or equipment to the ISO; and • does not relieve the Outage Requestor from compliance with any other obligation.

Materially Affected Requests

What it does:	Allows a Registered Participant that considers it is materially affected by a Planned Outage to request ISO involvement where the issue has not been resolved through the applicable consultation process. The Participant must demonstrate a direct and material impact before the ISO is required to undertake further coordination.
Why it is needed:	To provide a defined threshold for escalating unresolved impacts to the ISO, while preventing the outage coordination process from being triggered by minor or indirect concerns.
Key Working Group Feedback:	• Participants supported limiting ISO involvement to circumstances where outage impacts or risks could not be adequately addressed through the ordinary process. Discussion contemplated coordination where mitigations were outside the Outage Requestor's control or the risk could not be managed within the agreed risk appetite. • Participants were concerned about overcomplicating the process and unnecessarily capturing outages or contingencies that could otherwise be managed by Participants. • The process should preserve Participant responsibility for outages while providing a mechanism for unresolved material impacts affecting another Participant to be considered by the ISO.
Sources:	• Working Group meetings 1 and 2, including discussion of Participant responsibility, circumstances requiring further ISO involvement, differing Participant risk assessments and the need to avoid unnecessary intervention in ordinary outage planning. • ESM Rules, section 3.18C, as a comparative source for dealing with facilities affected by planned outages

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No Automatic Right of Objection

An Affected Registered Participant's disagreement with an Outage Plan does not of itself:

- prevent the ISO from approving the Outage Plan;
- establish that the Affected Registered Participant is materially affected; or
- require ISO coordination.

An Affected Registered Participant may seek ISO coordination only by submitting a Materially Affected Request in accordance with these Rules.

Making Materially Affected Request

An Affected Registered Participant may submit a Materially Affected Request where the participant reasonably considers that:

- the Planned Outage would directly and materially affect its facilities, equipment, network operations or ability to perform an obligation under these Rules;
- the impact cannot reasonably be avoided or managed through its ordinary operational arrangements; and
- where applicable, the concern not been resolved through consultation with the Outage Requestor under [Outage requestor consultation rule] or consideration by the ISO under [ISO consultation rule].

A Materially Affected Request must:

- identify the relevant Outage Plan;
- describe the nature, magnitude and expected duration of the impact;
- explain why the participant considers the impact to be material;
- where applicable, identify the steps taken to resolve the concern with the Outage Requestor or ISO;
- identify any reasonably practicable alternative or mitigation known to the Affected Registered Participant; and
- include any other information specified in the Outage Coordination Procedure.

A Materially Affected Request must not be based solely on:

- ordinary inconvenience or administrative cost;
- a commercial preference for a different outage time;
- an impact that the Registered Participant can reasonably manage through its ordinary operational arrangements; or
- a matter unrelated to the operational impact of the Planned Outage.

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ISO Outage Coordination

What it does:	Where the ISO determines that a Registered Participant is materially affected by a Planned Outage, allows the ISO to determine proportionate changes to timing, sequencing or mitigation only to the extent necessary to address the unresolved material impact, using the least burdensome reasonably practicable response.
Why it is needed:	To provide a proportionate mechanism for resolving material impacts between Participants that cannot otherwise be resolved, while limiting ISO intervention in Participants' outage decisions.
Key Working Group Feedback:	• Participants supported retaining responsibility for their own outages, with ISO intervention limited to defined circumstances where risks or impacts cannot otherwise be adequately managed. • Participants supported a common risk framework and proportionate mitigation rather than broad ISO discretion to defer or control outages. • The process should avoid unnecessary intervention in outages that Participants can manage themselves.
Sources:	• Working Group meetings 1 and 2, including discussion of Participant responsibility for outages, circumstances requiring ISO intervention, Participant controlled and ISO controlled mitigations and the need for clear limits on the ISO's role. Working Group 2 discussion contemplated ISO intervention where risk could not be managed within the agreed risk appetite or required mitigation was outside the Outage Requestor's control. • ESM Rules, section 3.18C, as a comparative source for coordination where other facilities are affected by an outage.

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Threshold Determination

On receiving a Materially Affected Request, the ISO must determine whether:

- the request satisfies the relevant requirements of these Rules; and
- the Affected Registered Participant would be materially affected by the Planned Outage.

A Materially Affected Request must be made within the timeframe specified in the Outage Coordination Procedure.

In determining whether the Affected Registered Participant would be materially affected, the ISO must have regard to:

- the nature, magnitude and duration of the impact;
- the significance of the impact to the Affected Registered Participant's operations;
- whether the impact can reasonably be managed in the ordinary course of operations;

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- whether the impact is an ordinary and reasonable consequence of necessary maintenance, testing or commissioning;
- the effectiveness and cost of available mitigation;
- the steps the Outage Requestor has taken to avoid or mitigate the impact;
- the consequences of changing or delaying the Planned Outage;
- any relevant effect on Power System Security and Reliability; and
- any other matter specified in the Outage Coordination Procedure.

The ISO may request further information from the Outage Requestor or Affected Registered Participant.

If the ISO determines that the Affected Registered Participant would not be materially affected, the ISO must:

- decline the request for coordination; and
- provide reasons to the Outage Requestor and Affected Registered Participant.

Coordination Determination

If the ISO determines that an Affected Registered Participant would be materially affected, the ISO must determine whether any action is reasonably required to address the material impact.

The ISO may determine that:

- no change to the Outage Plan is required;
- the Outage Window is to be varied;
- the duration of the Planned Outage is to be varied;
- the Outage Requestor is to implement an additional reasonable mitigation within its control;
- the ISO is to direct additional mitigation, including an Essential System Service or a constraint rule; or
- another action specified in the Outage Coordination Procedure is required.

A determination made above must:

- have regard to the NWIS Risk Appetite;
- be proportionate to the material impact;
- have regard to the costs and benefits of the available responses;

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- impose the least burden reasonably necessary to address the material impact;
- not require expenditure that is grossly disproportionate to the expected reduction in impact; and
- have regard to the maintenance, safety and asset-integrity consequences of delaying the Planned Outage.

The ISO must provide written reasons for its determination.

Relationship with PSSR Approval
Approval of an Outage Plan does not of itself determine whether an Affected Registered Participant is materially affected.

The ISO must not require a change to an Outage Plan solely because an Affected Registered Participant objects.

Where a Materially Affected Request is received before the ISO has decided the Outage Plan, the ISO may consider the request concurrently with its assessment of the Outage Plan.

Where a Materially Affected Request is received after approval, the ISO may vary the approval only to the extent reasonably necessary to give effect to a Coordination Determination.

Opportunistic Maintenance

What it does:	Provides an expedited process where an unexpected opportunity arises to undertake maintenance or other planned work that could not reasonably have been scheduled through the ordinary outage planning process. The ISO may determine whether the request qualifies and assess it having regard to PSSR risk, impacts on other outages or Participants, available time and resources.
Why it is needed:	To allow Participants to take advantage of short-notice maintenance opportunities while ensuring the ISO has sufficient time and resources to undertake any necessary assessment and consultation.
Key Working Group Feedback:	• Participants identified circumstances where valuable maintenance opportunities arise at short notice and the Rules should accommodate them.

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Sources:

- Working Group meetings 1 and 2, where Participants identified the need to accommodate short-notice maintenance opportunities that cannot readily be managed through ordinary outage planning timeframes.
- ESM Rules, section 3.18E, as a comparative.

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An Outage Requestor may request approval to undertake a Planned Outage as Opportunistic Maintenance where an outage or change in operating conditions creates an opportunity to undertake maintenance or other planned work that was not reasonably practicable to schedule through the ordinary outage planning process. A request for Opportunistic Maintenance must be submitted as soon as practicable after the opportunity is identified. The Outage Coordination Procedure must specify: • the process for submitting and assessing a request for Opportunistic Maintenance; • the information that must accompany a request, including information reasonably required to demonstrate that the request meets the requirements for Opportunistic Maintenance; • the timeframes for submission, assessment and decision; • any consultation requirements applying to the request; and • any other requirements applying to the coordination and approval of Opportunistic Maintenance. The ISO must determine whether a request meets the requirements for Opportunistic Maintenance before assessing the request under the expedited process. The ISO may request any further information reasonably required to make that determination. If the ISO determines that the request does not meet the requirements for Opportunistic Maintenance, the ISO may decline to assess the request under the expedited process and the proposed Planned Outage may be submitted or assessed under the otherwise applicable outage planning requirements. Where the ISO determines that the request qualifies as Opportunistic Maintenance, the ISO may approve, approve subject to conditions, or reject the request. In determining a request, the ISO may have regard to: • any PSSR risk associated with the proposed maintenance;

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- the effect of the proposed maintenance on other outages or Registered Participants;
- whether there is sufficient time to undertake any necessary assessment or consultation;
- whether the ISO has sufficient resources reasonably available to assess the request within the time available; and
- any other matter specified in the Outage Coordination Procedure.

The ISO may reject a request for Opportunistic Maintenance if, having regard to the timing of the request and the resources reasonably available to the ISO, the ISO is unable to complete the assessment and any required consultation before the proposed commencement of the maintenance.

The ordinary submission and decision timeframes applying to an Outage Plan do not apply to Opportunistic Maintenance, except to the extent specified in the Outage Coordination Procedure.

Ongoing Monitoring, Changes and Urgent Outages

What it does:	Requires ongoing monitoring of approved Outage Plans, permits non-material updates within the approved Outage Window, requires revised or new Outage Plans for Material Changes or extensions, and provides an expedited process for Urgent Outages.
Why it is needed:	To ensure approved Outage Plans remain appropriate as circumstances change, while allowing proportionate updates and an expedited pathway where urgent work cannot follow the ordinary process.
Key Working Group Feedback:	• Outage Requestors and the ISO should monitor for changes that may affect the risk associated with an approved Outage Plan. • Participants should be able to make non-material changes without unnecessary reassessment, while changes affecting PSSR risk should be reconsidered. • The Rules should accommodate genuinely urgent work without allowing the urgent process to circumvent ordinary outage planning requirements.
Sources:	• Working Group meeting 2, including discussion of ongoing monitoring of approved Outage Plans and changes in circumstances relevant to the assessed outage risk. • Draft Implementation Plan, section 3.10, which provides that Outage Plans may be updated after submission where the Outage Window is maintained, but an extension to the Outage Window requires a new submission.

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Ongoing monitoring

An Outage Requestor must monitor for changes in circumstances relevant to an approved Outage Plan and must notify the ISO as soon as practicable of any change that:

- may constitute a Material Change; or
- may materially change the PSSR risk associated with the Planned Outage.

The ISO must monitor information available to it for changes that may materially affect the PSSR risk associated with an approved Outage Plan.

Where the ISO identifies such a change, it may require the Outage Requestor to provide information reasonably necessary to determine whether the Outage Plan remains appropriate.

Updates within the Outage Window

An Outage Requestor may update an Outage Plan without submitting a new Outage Plan where:

- the approved Outage Window is maintained; and
- the update is not a Material Change.

The Outage Requestor must notify the ISO of the update in accordance with the Outage Coordination Procedure.

Material Changes

If a proposed update is a Material Change, the Outage Requestor must submit a revised Outage Plan. If the proposed change extends the approved Outage Window, the Outage Requestor must submit a new Outage Plan.

Urgent Outages

An Outage Requestor may use the expedited process specified in the Outage Coordination Procedure where:

- urgent work is required to protect safety;
- urgent work is required to prevent material equipment damage;
- a Forced Outage or unexpected equipment condition requires corrective work to protect safety or prevent material equipment damage;
- an outage must be extended because the Facility or equipment cannot safely return to service; or
- another urgent circumstance specified in the Outage Coordination Procedure applies.

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The Outage Requestor must provide the ISO with: • notice as soon as practicable; • the information reasonably available at the time; and • any outstanding required information as soon as practicable afterwards. The urgent process must not be used to avoid an ordinary planning obligation. The ISO must determine whether a request meets the requirements for an Urgent Outage before assessing the request under the expedited process. The ISO may request any further information reasonably required to make that determination.

Withdrawal of Approval and Recall of Outage

What it does:	Limits the ISO's ability to withdraw approval or recall an outage to circumstances where this is necessary to address a PSSR risk, with requirements for prompt notice, reasons and consideration of safe and reasonably practicable alternatives.
Why it is needed:	To provide Participants with certainty that an approved outage will generally be able to proceed, while allowing the ISO to intervene where changed circumstances create a PSSR risk.
Key Working Group Feedback:	• Participants emphasised the need for certainty in outage planning and supported limiting ISO intervention in Participants' outage decisions. • Withdrawal or recall should be a constrained power linked to PSSR risk rather than a general ability for the ISO to reconsider an approved outage. • Withdrawing approval requires some compensation provision.
Sources:	• Working Group meetings 1 and 2, including broader discussion of Participant responsibility for outages, certainty in outage planning and limiting the circumstances in which the ISO intervenes in planned outages. • Draft Implementation Plan, section 3.10, which expressly provides that the ISO may only withdraw approval for a previously approved Outage Plan where there is a risk to PSSR and must inform the Outage Requestor as soon as practicable. It also contemplates compensation where approval is withdrawn within one week of commencement or an outage is recalled.

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Withdrawal of Approval

The ISO may withdraw approval of an Outage Plan only where the ISO reasonably considers that proceeding with the Planned Outage would create a risk to Power System Security and Reliability.

The ISO must notify the Outage Requestor as soon as practicable after deciding to withdraw approval.

The notice must identify:

- the relevant PSSR risk;
- the information or changed circumstance giving rise to the risk;
- any reasonably practicable mitigation that may enable the Planned Outage to proceed; and
- any alternative Outage Window identified by the ISO.

Recall of outage

The ISO may recall an approved Planned Outage after commencement where the ISO reasonably considers that recall is necessary to manage a material PSSR impact.

In deciding whether to recall a Planned Outage, the ISO must have regard to:

- the materiality and immediacy of the PSSR risk;
- the Outage Requestor's stated recall time;
- available alternative mitigations; and
- the operational consequences of recall.

The Outage Requestor must use reasonable endeavours to comply with a recall decision, subject to the safe operation of its Facility and equipment.

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NWIS Outage Schedule and Confidentiality

What it does:	Requires the ISO to maintain and publish a current NWIS Outage Schedule and make specified information available to Registered Participants, while limiting access, use and disclosure of confidential, commercially sensitive and security-sensitive information. Additional information may be disclosed where necessary to assess or manage a direct and material outage impact.
Why it is needed:	To provide sufficient outage information to support effective planning and identify scheduling conflicts, while balancing transparency against competition risk, confidentiality and commercial sensitivity.
Key Working Group Feedback:	• Participants wanted sufficient visibility of planned outages to identify potential scheduling conflicts. • Information requirements need to balance the operational need for information with competition risks and the protection of confidential and commercially sensitive information. • Disclosure should therefore be proportionate to the purpose for which the information is required.
Sources:	• Working Group discussions, including the need for Participants to have sufficient outage information to identify scheduling conflicts, alongside concerns about commercial confidentiality and the information exchanged between Participants. • Draft Implementation Plan, section 3.10, which proposed a centralised outage coordination process and notification of certain outages to the ISO, providing the foundation for centralised outage information. • ESM Rules, section 3.18H, as the comparable framework in the WEM for making outage information available to participants.

Drafting Instruction

NWIS Outage Schedule

The ISO must maintain a NWIS Outage Schedule.

The NWIS Outage Schedule may include:

- approved Outage Plans;
- Notifiable Outages;
- relevant Outage Windows;
- the status of each outage; and
- any other information specified in the Outage Coordination Procedure.

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Drafting Instruction

The ISO must update the NWIS Outage Schedule as soon as reasonably practicable after becoming aware of a material change to information contained in the Schedule and, in any event, review the Schedule for currency at least fortnightly.

Information available to Registered Participants

The ISO must make information from the NWIS Outage Schedule available to Registered Participants in accordance with the Outage Coordination Procedure.

The Outage Coordination Procedure may specify:

- the information to be made available;
- the persons or classes of persons to whom information is to be made available;
- the manner in which information is to be made available; and
- any requirements relating to access to, use or handling of that information.

Confidential Information for Outage Coordination (Updated Rule 176)

A person who receives or obtains Confidential Information in connection with outage coordination under this Subchapter, including information made available through the NWIS Outage Schedule, must:

- ensure that the Confidential Information is only disclosed or made accessible to personnel who reasonably require access for the purposes of outage coordination, or to the extent reasonably necessary for audit, compliance or governance purposes; and
- not use, store, analyse or disseminate the Confidential Information for any purpose other than:
    - carrying out a function or obligation under this Subchapter;
    - assessing or managing an operational impact arising from an outage; or
    - otherwise seeking to achieve the System Security Objective.

Targeted Disclosure

The ISO may make additional information concerning an outage available to a Registered Participant where the ISO reasonably considers the information is necessary for the Registered Participant to assess or manage a direct and material impact of the outage or to exercise a function under this Subchapter.

The ISO must collect, use and disclose outage information in accordance with the information and confidentiality provisions of these Rules.

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Disputes and Compensation

What it does:	Provides review rights for specified ISO decisions and compensation arrangements where approval is withdrawn shortly before commencement or an outage is recalled.
Why it is needed:	To provide an avenue to challenge specified ISO decisions and address certain costs arising from late withdrawal of approval or recall of an outage.
Key Working Group Feedback:	**Neither the proposed dispute mechanism nor the compensation arrangements have been discussed with the Working Group. They are included in the architecture because they were expressly contemplated in the Draft Implementation Plan.**
Sources:	• Draft Implementation Plan, section 3.10, which proposes that ISO decisions, including decisions to include equipment on the Outage Planning List, may be disputed, and that an Outage Requestor may seek compensation for costs incurred where approval is withdrawn within one week of the scheduled start time or an outage is recalled. The Implementation Plan proposes that compensation costs be recovered from ISO fee payers. • ESM Rules, sections 3.18F and 3.18H, as comparative sources for outage-related review and compensation arrangements.

Drafting Instruction

NOTE: Not discussed in Working Group. Included to address the proposal in the Draft Implementation Plan.

Reviewable Decisions

A Rules Participant may dispute an ISO decision under this Subchapter in accordance with [applicable PNR dispute provisions].

A reviewable decision includes a decision:

- relating to the application of the Outage Planning List;
- to treat a Notifiable Outage as a Coordinated Outage;
- to approve an Outage Plan subject to conditions;
- to reject an Outage Plan;
- that a Registered Participant is or is not materially affected;
- to require a change to an Outage Plan;
- to withdraw approval;

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Drafting Instruction

- to recall an outage; or
- concerning entitlement to or the amount of compensation.

Commencement of a dispute does not stay an ISO decision where the ISO reasonably considers that a stay would create a material PSSR impact.

Compensation Entitlement

An Outage Requestor may claim compensation where the ISO:

- withdraws approval of an Outage Plan within one week before the scheduled commencement of the Planned Outage; or
- recalls the Planned Outage after it has commenced.

Subject to the above, compensation may be paid by the ISO for reasonable costs directly incurred by the Outage Requestor as a result of the withdrawal or recall.

Compensation is not payable to the extent that:

- the withdrawal or recall resulted from materially incomplete, inaccurate or misleading information provided by the Outage Requestor;
- the Outage Requestor failed to implement an approved mitigation or condition;
- the cost could reasonably have been avoided or mitigated;
- the cost would have been incurred irrespective of the withdrawal or recall; or
- another exclusion specified in these Rules applies.

The Outage Requestor must submit a claim:

- within the period specified in the Outage Coordination Procedure; and
- with sufficient information and evidence to substantiate the claim.

Compensation paid under this rule is to be recovered from ISO fee payers in accordance with these Rules.

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Outage Coordination Procedure

What it does:	Requires detailed operational and administrative matters, including lists, criteria, methodologies, templates, timeframes, expedited processes, information-sharing arrangements and claims administration, to be specified in the Outage Coordination Procedure.
Why it is needed:	To keep detailed and adaptable requirements in the Procedure while the Rules establish the key obligations, powers and safeguards, with changes to procedural detail subject to the Procedure Change Process.
Key Working Group Feedback:	• Participants supported important criteria and safeguards being established in the Rules, with more detailed and adaptable requirements sitting in the Procedure. • Participants emphasised the need for transparency and consultation in developing key matters such as the risk framework, risk appetite and equipment list.
Sources:	• Working Group meetings 1 and 2, including discussion of the risk framework, equipment list and other detailed outage coordination requirements being developed through procedures in consultation with Participants. • ESM Rules, sections 3.18–3.21, which establish the WEM framework for outage planning, submission, coordination, evaluation, revisions, outage intentions, recall and forced outages, including specific powers for procedural detail under the Rules. • AEMO WEM Procedure: Outages, which provides the detailed procedural requirements for outage planning, Outage Plan information, assessment and evaluation, opportunistic maintenance, outage coordination, execution and changes to approved outages. The Procedure is made under ESM Rules clauses 3.18.4, 3.18C.12, 3.18E.10 and 3.21.10.

Drafting Instruction
Requirement to Make a Procedure The ISO must develop and maintain an Outage Coordination Procedure. The Outage Coordination Procedure must include: • the Outage Planning List; • criteria for determining whether an outage is an Excluded Outage, Notifiable Outage or Outage Plan; • notification requirements for Notifiable Outages; • Outage Plan information requirements and submission timeframes; • pre-submission consultation requirements applying to existing relevant contractual relationships; • ISO process for identifying and obtaining input from other materially affected Registered Participants;

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Drafting Instruction

- the Outage Assessment Framework;
- the applicable NWIS risk appetite or risk-acceptance thresholds;
- Materially Affected Request requirements;
- the ISO coordination process and available determinations;
- Opportunistic Maintenance
- the process for updates and Material Changes;
- the expedited process for Urgent Outages;
- the information included in the NWIS Outage Schedule;
- the process for making and assessing compensation claims;
- record-keeping and reporting requirements; and
- any other matter necessary to implement this section.

The Outage Coordination Procedure must be developed and amended in accordance with the Procedure Change Process in Sub-Appendix 2.3.

Principles Applying to Procedure

In developing or amending the Outage Coordination Procedure, the ISO must have regard to:

- the materiality of the relevant PSSR risk;
- participant autonomy and responsibility for participant-owned Facilities and equipment;
- the administrative and compliance burden arising from the proposed requirements;
- whether notification would adequately manage the relevant risk without requiring an Outage Plan;
- the need for consistent and transparent assessment;
- protection of confidential and commercially sensitive information;
- relevant operational experience;
- the desirability of avoiding unnecessary competitor-to-competitor coordination; and
- the Pilbara Electricity Objective.

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Department of
Energy and Economic Diversification

GOVERNMENT OF WESTERN AUSTRALIA

EPNR Working Group

4 November 2026

ESS cost recovery in the PNR

FCESS (regulation) costs currently fall upon the party responsible for nominating energy volumes. By default, this is the network user. The allocation is calculated based on the size of the difference between maximum load and minimum load for the entire three-year reference period, even if their load is extremely predictable.

SRESS (contingency reserve raise) costs are recovered from connected parties based on the size of their largest generation unit, regardless of how many units the participant has or whether the largest unit actually operated in any particular time period.

These arrangements are reasonable when participants have similarly sized generation portfolios, large units are run at high-capacity factors, and there are few intermittent facilities. As renewables and storage enter the system these arrangements are not appropriate and will increasingly allocate costs to parties who do not drive the need for these services and cannot control their exposure to the costs.

EPNR Review outcomes: ESS cost recovery

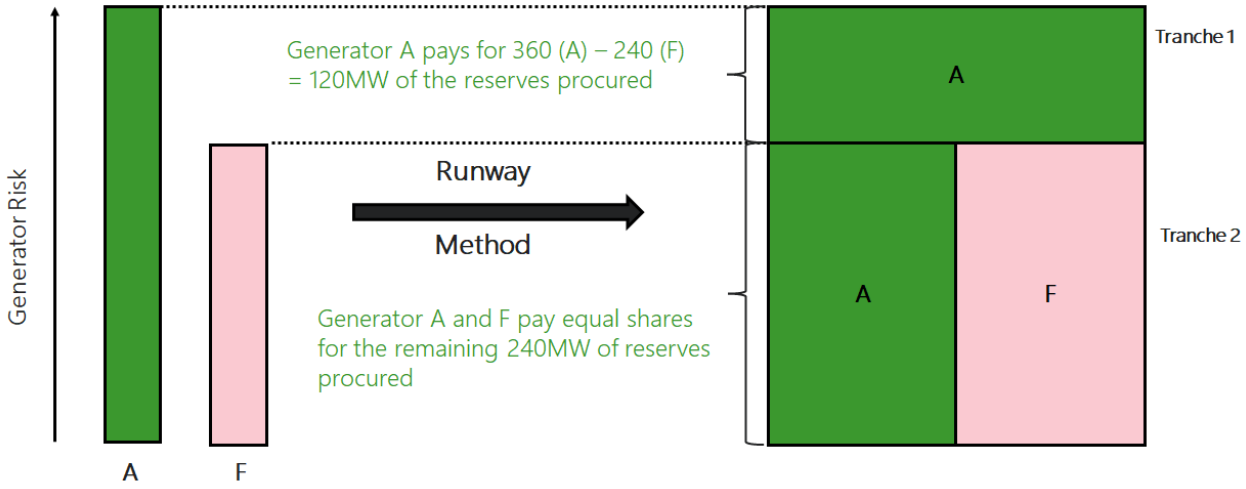
ID	Outcome
5.1	ESS costs will be recovered from causers, where practical, on a trading interval basis.
5.2	Regulation costs will be allocated to participants who vary, beyond an applicable tolerance, their generation or load from their balancing positions.
5.3	Contingency Reserve Raise costs will be allocated to supply facilities based on their output in each interval, according to the runway method.
5.4	Facilities will be exempt from Contingency Reserve Raise costs if they provide evidence that an Energy Producing Facility trip would be automatically offset by load curtailment on the same site.
5.5	Contingency Reserve Lower costs will be allocated to large loads based on their demand in each interval, according to a runway method.

CRR: The runway method

The runway method allocates contingency reserve costs to generators based on the MW needed to cover the risk of them tripping.

The current PNR approach uses the nameplate capacity of one facility for each participant. This approach is not suitable for a supply fleet where participants have different sized portfolios with increasing volumes of renewable generation.

The proposed approach uses actual generation in each half-hour interval.



Implementation: Contingency raise

In the NWIS, the ISO procures CRR in two ways: a contract for a base quantity that is always available, and supplementary service that can be enabled and disabled by system controllers as needed. We propose to determine a cost per interval as follows:

- Allocate costs of the base quantity evenly across all trading intervals.
- Allocate costs of supplementary services to the trading intervals in which they are used.

To determine the runway shares, we will need to collate half-hour interval generation data for each energy producing facility.

If a part of the NWIS is islanded, then supplementary services may be required solely for that island. It would be possible to calculate a separate runway allocation for each island, but the effort required likely outweighs the avoided distortion to causer allocation.

What implementation issues do members see for this approach?

Implementation: Regulation (1)

The ISO currently contracts for regulation on an annual basis. There is a primary provider, who provides the same quantity all year round, and secondary providers, who only provide service when the primary provider cannot (e.g. if it has an outage, or there is an islanding event).

When responding to frequency changes within a trading interval, a regulation provider may generate more or less energy than it had planned to. This additional energy is accounted for in energy settlement calculations, where participants pay penalty rates for their out of balance energy.

The remaining contract payments must still be recovered. Currently, these costs are allocated to participants based on the difference between their maximum load and their minimum load for the entire three-year reference period. This does not reflect the predictability of the load, and does not reflect what drives the regulation requirement.

Causers of the need for regulation are those whose net generation or consumption varies from their scheduled quantity within a dispatch interval – i.e. those with energy imbalances.

Implementation: Regulation (2)

There are two options to allocate costs based on energy imbalances. Both need interval level scheduling and meter data.

- Per trading interval:
  - divide regulation costs across half-hour intervals so that costs are higher in intervals where the requirement is higher
  - allocate those costs to participants based on the absolute value of the difference between the scheduled quantity and the metered quantity in that interval.
- Per settlement period:
  - Calculate regulation costs for the settlement period as a whole
  - Calculate the difference between the scheduled quantity and metered quantity in each interval
  - Allocate costs based on the sum of the absolute values of per-interval energy imbalances.

What implementation issues do members see for this approach?

Exemptions from funding ESS costs

- Contingency reserve:
  - where a participant provides its own reserve for a supply facility behind the connection point which does not export, then it need not contribute to system-wide ESS costs.
  - To exclude a supply facility behind a connection point from the runway allocation, the ISO must be satisfied that it need not provision reserve for that facility. That means that the participant must demonstrate that it has automated mechanisms in place to automatically shed load if the supply facility trips.
- Regulation:
  - Participants cannot be exempted from contributing to regulation costs.
  - Participants can theoretically reduce their exposure to zero by accurate operation.