



INDEPENDENT  
MARKET  
OPERATOR



## Draft Rule Change Report: Provision of Network Information to System Management (RC\_2014\_10)

Standard Rule Change Process

26 March 2015

## Executive summary

The IMO proposed to amend the current processes in the Wholesale Electricity Market (WEM) Rules (Market Rules) relating to the provision of Network information by a Network Operator to System Management. Currently, under the Market Rules, as a pre-condition to registering a Network, a Network Operator is required to provide the Standing Data prescribed in Appendix 1(a) of the Market Rules to the IMO. The IMO is then required to provide this Standing Data to System Management, which System Management uses to set the limits in each Trading Interval for the operation of the South West interconnected system (SWIS) in each SWIS Operating State.

The IMO considers that the current process is impractical because the information in Appendix 1(a) of the Market Rules is dynamic and should therefore not be provided as Standing Data. The IMO also considers that this process is inefficient because the IMO does not use or require the information to carry out any of its functions under the Market Rules, and therefore does not need to act as an intermediary in this information flow.

### Proposed amendments

The IMO proposed to clarify obligations and definitions in the Market Rules, and align the Market Rules with current practice by:

- removing the requirement for a Network Operator to provide Standing Data to the IMO as a pre-condition for registering a Network;
- requiring System Management to document in a Power System Operation Procedure (PSOP) the Network information that must be provided by a Network Operator to System Management;
- amending the definition of a Network to provide greater detail on what a network is, and better distinguish Network equipment from non-Network equipment; and
- aligning the wording of a number of clauses of the Market Rules related to the registration of a Network Operator and a Network with the proposed amended definition of a Network.

### Consultation

The IMO presented a pre Rule Change Proposal to the Market Advisory Committee (MAC) at its 3 December 2014 meeting where members agreed that the proposal should be submitted into the formal rule change process. The IMO formally submitted the Rule Change Proposal into the Standard Rule Change Process and published the Rule Change Notice on 13 January 2015.

The first submission period was held between 14 January and 25 February 2015. The IMO received submissions from Community Electricity and Perth Energy with regard to the Rule Change Proposal. Both submissions were supportive of the proposed amendments.

Community Electricity noted that the proposal would improve the efficiency of the market by removing the superfluous intermediate process of the IMO receiving Network information for the sole purpose of providing it to System Management. Perth Energy noted that the

proposed amendments would remove any ambiguity from the Market Rules, but also proposed that the definition of a Network under the Market Rules be made consistent with the definition of 'Network' under the Electricity Network Access Code 2004, which is taken from the definition of 'Network Infrastructure Facilities' in the *Electricity Industry Act 2004*.

### **Assessment against the Wholesale Market Objectives**

The IMO considers that the Rule Change Proposal better achieves Wholesale Market Objectives (a) and (d) by enhancing economic efficiency and reducing the cost of administering the WEM by:

- clarifying and providing greater certainty to Network Operators of their obligations under the Market Rules;
- ensuring the Market Rules provide System Management with access to the dynamic Network information required to maintain Power System Security and Reliability;
- providing a more practical and efficient process relating to the provision of Network information by each Network Operator to System Management; and
- providing more transparent and clear Market Rules, thereby reducing the time and effort of interpretation and compliance.

### **Practicality and cost of implementation**

The IMO estimates the the proposed changes will cost approximately \$3,300 to remove the Standing Data fields for Network Facilities from the Market Participant Interface. However, as these changes are not necessary prior to commencement, the IMO will schedule this work with other related system changes to minimise the implementation cost.

The IMO will assess, for each of the relevant parties and transmission and distribution systems, whether an exemption from registering as a Network Operator and/or registering the Network Facility is appropriate, and where appropriate, will work with the relevant parties to progress the operational process of registration or exemption.

The IMO notes that the Market Procedure: Rule Participant Registration and De-Registration and the Market Procedure: Facility Registration, De-Registration and Transfer do not currently detail all the situations (and clauses in the Market Rules) which allow for an exemption from registering as a Network Operator and Network Facility, respectively. The IMO therefore proposes to more fully detail the exemption process in these Market Procedures, and make other proposed amendments to streamline and clarify the processes.

The IMO will also work with System Management to detail the requirements for the provision of Network information from a Network Operator to System Management in a PSOP.

No Rule Participants have noted any issues related to the practicality of implementing the proposed amendments.

As clauses 2.28.2, 2.28.3, 2.28.4 of the Market Rules are Protected Provisions, the proposed Amending Rules in this Rule Change Proposal will require Ministerial approval. The IMO will continue to work with the Public Utilities Office to progress the proposed amendments.

### **The IMO's proposed decision**

The IMO's proposed decision is to accept the Rule Change Proposal as modified following the first submission period.

### **Next steps**

The IMO now invites interested stakeholders to make submissions on this Draft Rule Change Report by **5:00 PM on Tuesday 28 April 2015**.

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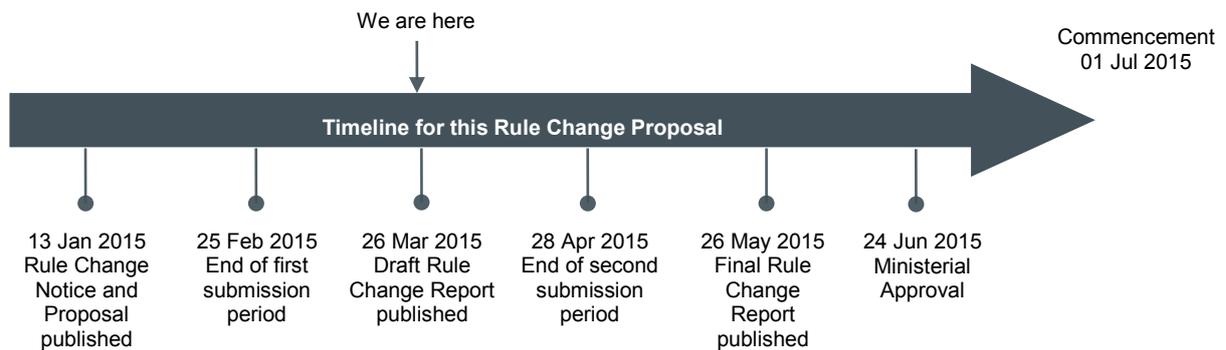
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## 1. Rule change process and timeline

On 13 January 2015, the IMO submitted a Rule Change Proposal regarding amendments to clauses 2.28.2, 2.28.3, 2.28.4, 2.29.3, 2.29.3A (new), the Glossary and Appendix 1 of the Wholesale Electricity Market (WEM) Rules (Market Rules) to remove the requirement for the IMO to act as an intermediary in the provision of Network information from Network Operators to System Management.

This proposal is being processed using the Standard Rule Change Process, described in section 2.7 of the Market Rules.

The key dates in processing this Rule Change Proposal are:



## 2. Call for second round submissions

The IMO invites interested stakeholders to make submissions on this Draft Rule Change Report. The second submission period is 20 Business Days from the publication date of this report. Submissions must be delivered to the IMO by **5:00 PM on Tuesday 28 April 2015**.

The IMO prefers to receive submissions by email to [market.development@imowa.com.au](mailto:market.development@imowa.com.au) using the submission form available at: <http://www.imowa.com.au/wem-rule-changes>.

Submissions may also be sent to the IMO by post, addressed to:

### Independent Market Operator

Attn: Group Manager, Development and Capacity

PO Box 7096

Cloisters Square, PERTH, WA 6850

## 3. Proposed amendments

### 3.1 The Rule Change Proposal

The proposed amendments clarify obligations and definitions in the Market Rules, and align the Market Rules with current operations by:

- removing the requirement for a Network Operator to provide Standing Data to the IMO as a pre-condition of the registration of a Network;

- requiring System Management to document in a Power System Operation Procedure (PSOP) the Network information that must be provided, and the process relating to how access to this information is to be provided, by a Network Operator to System Management;
- amending the definition of a Network to provide greater detail on what a network is, by reference to its physical characteristics, and better distinguish Network equipment from non-Network equipment to provide greater certainty to parties in relation to their obligations to register as a Network Operator and to register a Network Facility; and
- aligning the wording of a number of clauses of the Market Rules related to the registration of a Network Operator and a Network Facility with the proposed definition of a Network.

Full details of the Rule Change Proposal are available at: [www.imowa.com.au/RC\\_2014\\_10](http://www.imowa.com.au/RC_2014_10).

### **3.2 The IMO's initial assessment of the Rule Change Proposal**

The IMO decided to proceed with the proposal on the basis that section 4 of the Rule Change Proposal indicated that the proposed amendments would better achieve the Wholesale Market Objectives. In particular, the Rule Change Proposal indicated that the proposed amendments would allow the Market Rules to better achieve Wholesale Market Objectives (a) and (d).

The IMO therefore considered that Rule Participants should be given an opportunity to provide submissions on the proposal.

### **3.3 Protected Provisions, Reviewable Decisions and civil penalties**

Clauses 2.28.2, 2.28.3, 2.28.4 of the Market Rules are Protected Provisions under clause 2.8.13 of the Market Rules. Therefore, under clause 2.8.3 of the Market Rules, the proposed Amending Rules in this Rule Change Proposal must be approved by the Minister.

The proposed amendments in this Rule Change Proposal do not amend any clauses which are Reviewable Decisions or civil penalty provisions but do cross-reference, and are cross-referenced by clauses that are Reviewable Decisions and civil penalty provisions. The IMO notes that the proposed amendments do not substantially change the meaning or effect of these cross-referenced clauses.

The IMO will continue to work with the Public Utilities Office (PUO) to progress this Rule Change Proposal.

## **4. Consultation**

### **4.1 The Market Advisory Committee**

The IMO presented the pre Rule Change Proposal to the Market Advisory Committee (MAC) at its 3 December 2014 meeting. The following comments were made:

- Mr Dean Sharafi noted that System Management would not be able to store or be responsible for the Network information provided to it. Ms Erin Stone clarified that the

obligation on a Network Operator was to provide System Management with access to its Network information, consistent with current practice.

- Mr Shane Cremin queried where the existing obligations for a Network Operator to provide Network information via the IMO to System Management reside. Ms Kate Ryan responded that the obligation exists in the Standing Data requirements in Appendix 1 of the Market Rules.

MAC members agreed that the IMO should submit the Rule Change Proposal into the formal process and progress it using the Standard Rule Change Process.

Minutes from the meeting are available at: <http://www.imowa.com.au/MAC>.

#### 4.2 Submissions received during the first submission period

The first submission period for this Rule Change Proposal was held between 14 January 2015 and 25 February 2015. The IMO received submissions from Community Electricity and Perth Energy.

Both submissions were supportive of the proposed amendments on the basis that the proposed Amending Rules would improve efficiency by:

- removing the superfluous intermediate process of the IMO receiving Network information for the sole purpose of providing it to System Management, without affecting the operation of the rules; and
- removing any ambiguity that may exist around the way in which System Management may access the most accurate and up to date information about the South West interconnected system (SWIS) at all times to ensure it makes the most safe and efficient decisions in relation to the way it manages all resources on the system.

The submitters' assessment against Wholesale Market Objectives is provided in the table below:

Submitter	Wholesale Market Objective Assessment
Community Electricity	Improves the integrity of the Market Rules and is consistent with all the Wholesale Market Objectives.
Perth Energy	Better achieves Wholesale Market Objectives (a) and (d).

While Perth Energy agreed in principle with the proposal to amend the definition of a Network to more closely align with the definition in the Electricity Network Access Code 2004 (Access Code), it proposed that the IMO should adopt the exact definition from the Access Code in the Market Rules. This was on the basis that the definition under the Access Code goes into more detail compared to the proposed new definition for the Market Rules<sup>1</sup>.

<sup>1</sup> The Access Code defines a 'Network' as 'network infrastructure facilities' in the *Electricity Industry Act 2004* (Act) which is defined as:  
(a) the electrical equipment that is used only in order to transfer electricity to or from an electricity network at the relevant point of connection including any transformers or switchgear at the relevant point or which is installed to support or to provide backup to that electrical equipment as is necessary for that transfer; and  
(b) the wires, apparatus, equipment, plant and buildings used to convey, and control the conveyance of, electricity, which together are operated by a person (a network service provider) for the purpose of transporting electricity from generators of electricity to other electricity networks or to end users of electricity.

A copy of all submissions in full received during the first submission period is available at: [www.imowa.com.au/RC\\_2014\\_10](http://www.imowa.com.au/RC_2014_10).

### **4.3 The IMO's response to submissions received during the first submission period**

Perth Energy considers that adopting the same definition of a Network, either by reference to the Act or by copying the wording exactly, would ensure consistency and remove any possibility for confusion as to what is meant by a Network in the industry more broadly.

The IMO agrees that, to the extent possible, it is advantageous to align the definition of a Network in the Market Rules with other key legislative instruments governing the electricity industry to improve transparency and reduce the potential for confusion. Accordingly, the IMO has proposed further amendments to the definition of a Network in the Market Rules in this Draft Rule Change Report to more closely align it with the definition in the Access Code. However, the IMO notes that it is inappropriate to fully align the definition of a Network in the Market Rules with that in the Access Code because:

- the definition of a Network in the Market Rules should only include electrical equipment used to transfer electricity – the definition in the Access Code includes other plant and equipment such as buildings that are not relevant in the context of operating the WEM;
- the definition of a Network in the Market Rules should only include electrical equipment which is used to transfer electricity within the SWIS – the definition in the Access Code includes transfer to and from the SWIS which is not relevant in the context of operating the WEM; and
- the definition of a Network in the Market Rules should make reference to the registration of the electrical equipment as a 'Network' under clause 2.29.3 of the Market Rules to clarify the point at which obligations under the Market Rules apply – the definition in the Access Code is not designed to consider the application of the Market Rules to participants with Network Facilities.

### **4.4 Public forums and workshops**

The IMO did not hold any public forums or workshops specifically with regard to this Rule Change Proposal. However, the IMO has discussed this Rule Change Proposal with representatives from System Management, Western Power and other owners of network infrastructure in the SWIS.

## **5. The IMO's draft assessment**

In preparing its Draft Rule Change Report, the IMO must assess the Rule Change Proposal in light of clauses 2.4.2 and 2.4.3 of the Market Rules.

Clause 2.4.2 outlines that the IMO "must not make Amending Rules unless it is satisfied that the Market Rules, as proposed to be amended or replaced, are consistent with the Wholesale Market Objectives".

Additionally, clause 2.4.3 states, when deciding whether to make Amending Rules, the IMO must have regard to the following:

- any applicable policy direction from the Minister regarding the development of the market;
- the practicality and cost of implementing the Rule Change Proposal;
- the views expressed in submissions and by the MAC; and
- any technical studies that the IMO considers necessary to assist in assessing the Rule Change Proposal.

The IMO notes that there has not been any applicable policy direction from the Minister or any technical studies commissioned in respect of this Rule Change Proposal. A summary of the views expressed in submissions and by the MAC is available in section 4 of this report.

The IMO's assessment is outlined in the following sub-sections.

### **5.1 Additional amendments to the proposed Amending Rules**

Following the first submission period the IMO has made further amendments to the definition of a Network in the Market Rules to more closely align it with the definition in the Access Code and Act to reflect a suggestion received from Perth Energy.

The changes that the IMO has made to the Amending Rules presented in the Rule Change Proposal are outlined in detail in Appendix A of this Draft Rule Change Report.

### **5.2 Assessment against the Wholesale Market Objectives**

The IMO considers that the Market Rules as a whole, if amended as presented in section 7, will better achieve Wholesale Market Objectives (a) and (d) and be consistent with the remaining Wholesale Market Objectives.

- (a) promote the economically efficient, safe and reliable production and supply of electricity and electricity related services in the South West interconnected system
- (d) to minimise the long-term cost of electricity supplied to customers from the South West interconnected system

The IMO considers that the proposed amendments to align the Market Rules with current operations and better define what constitutes a Network for the purposes of operating the WEM would enhance economic efficiency by:

- clarifying and providing greater certainty to Network Operators of their obligations under the Market Rules;
- ensuring that the Market Rules provide System Management with access, at all times, to the dynamic Network information required to maintain Power System Security and Reliability; and
- providing a more practical solution to the manual process currently contemplated in the Market Rules in regard to the provision of access to Network information by each Network Operator to System Management.

The proposed amendments would also support the safe and reliable supply of electricity, by ensuring that the Market Rules provide System Management with direct access to the

dynamic Network information relevant to each Trading Interval, rather than indirect and static information provided through the IMO as currently contemplated by the Market Rules.

The IMO also considers that the proposed changes to clarify definitions and obligations in the Market Rules would provide for more transparent and clear obligations for Rule Participants and therefore would reduce the time and effort of interpretation and compliance, reducing the cost of administering the WEM.

### **5.3 Practicality and cost of implementation**

#### **5.3.1 Practicality**

The IMO will work with System Management to detail the requirements for the provision of Network information in a PSOP. The IMO expects that the requirements in the PSOP will be documented similarly to those in the Market Procedure: IMS Interface.

The IMO will need to make system changes to the Market Participant Interface (MPI) to remove the Standing Data fields for Network Facilities. However, this will not need to occur prior to the commencement of the proposed Amending Rules in this Rule Change Proposal. The IMO will therefore coordinate the timing of these changes with other changes that it needs to make to its systems to minimise the cost and impact of the implementation.

The IMO notes that the Market Procedure: Rule Participant Registration and De-Registration and the Market Procedure: Facility Registration, De-Registration and Transfer do not currently detail all the situations (and clauses in the Market Rules) that allow for an exemption from registering as a Network Operator or registering a Network Facility, respectively. The IMO therefore proposes to more fully detail the exemption processes in these Market Procedures, and make other proposed amendments to streamline and clarify the processes.

The IMO will assess, for each of the relevant parties and transmission and distribution systems, whether an exemption from registering as a Network Operator or registering a Network Facility is appropriate, and where appropriate, will work with the relevant parties to progress the operational process of registration or exemption.

As clauses 2.28.2, 2.28.3, 2.28.4 of the Market Rules are Protected Provisions, the proposed Amending Rules in this Rule Change Proposal will require Ministerial approval. The IMO will continue to work with the PUO to progress the proposed amendments.

#### **5.3.2 Cost**

The IMO estimates the the proposed changes will cost approximately \$3,300 to remove the Standing Data fields for Network Facilities from the MPI. As previously noted, the IMO will schedule this work with other related system changes to minimise the implementation cost. The IMO will also incur minor costs associated with the associated Procedure Change Processes. These costs can be accommodated within the IMO's existing budget.

There will also be minor costs associated with the documentation of the process relating to the provision of Network information between Network Operators and System Management in a PSOP. However, the IMO understands that these costs associated with this are able to be accommodated within System Management's existing budget.

## 6. The IMO's proposed decision

The IMO's proposed decision is to accept the Rule Change Proposal as modified after the first submission period as outlined in section 5.1 of this Draft Rule Change Report.

### 6.1 Reasons for the decision

The IMO made its proposed decision on the basis that the Amending Rules:

- better achieve Wholesale Market Objectives (a) and (d);
- are consistent with the remaining Wholesale Market Objectives;
- would better reflect current operational practice and provide for a more efficient method of data provision than is currently contemplated by the Market Rules;
- remove an impediment to registration of Network Facilities in the WEM; and
- have the support of the MAC and the submissions received during the first submission period.

### 6.2 Proposed commencement details

The Amending Rules are proposed to commence at **8:00 AM** on **1 July 2015**.

## 7. Proposed Amending Rules

The proposed Amending Rules as presented in the Rule Change Proposal and amended following the first submission period are as follows (~~deleted text~~, added text):

- 2.28.2. Subject to clauses 2.28.3 and 2.28.16, a person who owns, controls or operates electrical equipment (including wires, apparatus, transformers and switchgear) that is used to transfer electricity between the relevant points of connection, for the purpose of transporting electricity from a generating system to end users of electricity within the SWIS ~~a transmission system or distribution system which forms part of the South West Interconnected System, or is electrically connected to that system,~~ must register as a Rule Participant in the Network Operator class.
- 2.28.3. A person ~~that~~ who owns, controls or operates electrical equipment (including wires, apparatus, transformers and switchgear) that is used to transfer electricity between the relevant points of connection, for the purpose of transporting electricity from a generating system to end users of electricity within the SWIS, ~~a transmission system or distribution system~~ may, but is not required to, register as a Rule Participant in the Network Operator class ~~where~~ if both of the following are satisfied ~~apply~~:
- (a) System Management informs the IMO that it ~~has determined that it does~~ not require information about the relevant network to maintain Power System Security and Power System Reliability; and

- (b) no Market Participant Registered Facilities are directly connected to the transmission system or distribution system.
- 2.28.4. A person who intends to own, control or operate electrical equipment (including wires, apparatus, transformers and switchgear) that will be used to transfer electricity between the relevant points of connection, for the purpose of transporting electricity from a generating system to end users of electricity within the SWIS a transmission system or distribution system which will form part of the South West Interconnected System, or will be electrically connected to that system, may register as a Rule Participant in the Network Operator class.
- ...
- 2.29.3. Subject to clause 2.29.9, a Network Operator must register as a Network, any electrical equipment (including wires, apparatus, transformers and switchgear) that it owns, operates or controls, where the electrical equipment is used to transfer electricity between the relevant points of connection, for the purpose of transporting electricity from a generating system to end users of electricity within the SWIS any transmission system or distribution system owned, operated or controlled by that Network Operator as a Network, where that transmission or distribution system forms part of the South West Interconnected System, or is electrically connected to that system.
- 2.29.3A. System Management must develop a Power System Operation Procedure specifying:
- (a) information that a Network Operator must provide to System Management, for each of its Networks, including:
- (i) positive, negative and zero sequence network impedances for the network elements;
  - (ii) information on the network topology;
  - (iii) information on transmission circuit limits;
  - (iv) information on security constraints;
  - (v) overload ratings, including details of how long overload ratings can be maintained; and
  - (vi) the short circuit capability of facility equipment;
- (b) the processes to be followed by a Network Operator to enable System Management to have access to the information specified in clause 2.29.3A(a);
- (c) technical and communication criteria that a Network Operator must meet with respect to System Management's ability to access the information specified in clause 2.29.3A(a); and
- (d) the processes to be followed by System Management when accessing the information specified in clause 2.29.3A(a).

...

## 11 Glossary

**Network:** The electrical equipment (including wires, apparatus, transformers and switchgear) that is used to transfer electricity between the relevant points of connection, for the purpose of transporting electricity from a generating system to end users of electricity within the SWIS, and registered to a Network Operator under clause 2.29.3.

**Network:** ~~A transmission system or distribution System registered as a Network under clause 2.29.3.~~

...

## Appendix 1: Standing Data

This Appendix describes the Standing Data to be maintained by the IMO for use by the IMO in market processes and by System Management in dispatch processes.

Standing Data required to be provided as a pre-condition of Facility Registration and which Rule Participants are to update as necessary, is described in clauses (a) to (i).

Standing Data not required to be provided as a pre-condition of Facility Registration but which the IMO is required to maintain, and which Rule Participants are to update as necessary, includes the data described in clauses (j) to (m).

- (a) ~~[blank]for a Network:~~
- ~~i. positive, negative and zero sequence network impedances for the network elements;~~
  - ~~ii. information on the network topology;~~
  - ~~iii. information on transmission circuit limits;~~
  - ~~iv. information on security constraints;~~
  - ~~v. overload ratings, including details of how long overload ratings can be maintained; and~~
  - ~~vi. the short circuit capability of facility equipment.~~

...

## Appendix A. Further amendments to the proposed Amending Rules

The IMO proposes to make amendments to the proposed Amending Rules following the first submission period. These changes are as follows (~~deleted text~~, added text):

- 2.28.2. Subject to clauses 2.28.3 and 2.28.16, a person who owns, controls or operates electrical equipment (including wires, apparatus, transformers and switchgear) that is used ~~in order to transfer electricity within the SWIS, and between the relevant points of connection for a distribution or transmission system,~~ for the purpose of transporting electricity from a generating system to end users of electricity within the SWIS, must register as a Rule Participant in the Network Operator class.
- 2.28.3. A person ~~that~~who owns, controls or operates electrical equipment (including wires, apparatus, transformers and switchgear) that is used ~~in order to transfer electricity within the SWIS, and between the relevant points of connection for a distribution or transmission system,~~ for the purpose of transporting electricity from a generating system to end users of electricity within the SWIS, may, but is not required to, register as a Rule Participant in the Network Operator class ~~where-if~~ both of the following are ~~satisfied~~ apply:
- (a) System Management informs the IMO that it ~~has determined that it does not require information about the relevant network to maintain Power System Security and Power System Reliability;~~ and
  - (b) no Market Participant Registered Facilities are directly connected to the transmission system or distribution system.
- 2.28.4. A person who intends to own, control or operate electrical equipment (including wires, apparatus, transformers and switchgear) that will be used ~~in order to transfer electricity within the SWIS, and between the relevant points of connection for a distribution or transmission system,~~ for the purpose of transporting electricity from a generating system to end users of electricity within the SWIS, may register as a Rule Participant in the Network Operator class.

...

- 2.29.3. Subject to clause 2.29.9, a Network Operator must register as a Network, any electrical equipment (including wires, apparatus, transformers and switchgear) that it owns, operates or controls, where the electrical equipment is used ~~in order to transfer electricity within the SWIS, and between the relevant points of connection,~~ for the purpose of transporting electricity from a generating system to end users of electricity within the SWIS ~~for a distribution system or transmission system.~~

...

## 11 Glossary

**Network:** The electrical equipment (including wires, apparatus, transformers and switchgear) that is used ~~in order to transfer electricity within the SWIS, and between relevant points of~~

connection, ~~for a distribution system or transmission system~~ for the purpose of transporting electricity from a generating system to end users of electricity within the SWIS, and registered to a Network Operator under clause 2.29.3.