

Attachment 12.2

GHD Application and Queuing Policy (AQP) Customer Engagement Report

Access Arrangement Supplementary

Confidential

2 October 2017





Western Power

AQP Review Report

12/6/2017



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1. Executive summary

GHD Advisory on behalf of Western Power initiated a stakeholder consultation process in relation to the proposed changes to the AQP for Access Arrangement 4 (AA4). Specifically to:

1. Obtain feedback and commentary on the proposed 20 changes set out in the briefing paper (Appendix A)
2. Seek feedback on other areas or aspects of the AQP and the processes governed by the AQP that merit refining and or on gaps that Western Power needs to take into consideration in this review

Stakeholder Engagement

The AQP stakeholder engagement process aimed to:

- explain the proposed AQP changes including the issues being addressed by each of the AQP revisions;
- provide stakeholders with an opportunity to understand the issues and the implications of the proposed changes; and
- capture feedback on the proposed revisions to the AQP.

GHD Advisory's approached this assignment by completing the following stages of work:

Stage 1 – Review of required changes to AQP

An assessment and review of the proposed changes to the AQP was completed to confirm our understanding of the reason for each change, verify the need to proceed with the change during AA4 and to develop a summarised description of each change suitable for review by stakeholders. GHD's summarised description was verified as appropriate by Western Power and developed into a briefing paper which was made available to stakeholders.

Stage 2 – Stakeholder Engagement Stakeholder analysis and Identification

Following a stakeholder identification and analysis the following engagement activities were conducted:

1. *Stakeholder Forum* - A stakeholder forum was held at Western Power's offices in Perth on 3 May 2017.
2. *One-on-one interviews* - Stakeholders were invited to register for one-on-one interviews so they could provide feedback on the changes they were unable to the above means. One-on-one interviews were conducted on 4 May 2017.
3. *Written submissions* - Stakeholders were provided with opportunity to submit a written submission detailing their input into the review process. Written submissions remained open to 19 May 2017.

Summary of Results

The following table presents a summary of the support for each proposed change listed in the briefing paper and the new issues raised by stakeholders. In the following table we have classified each of the proposed changes by applying the following ratings:

- not opposed – no submission received opposed the proposed change
- potential support – some stakeholders did not oppose the change while others have reserved their position until they have reviewed the detailed drafting
- mixed support – there is a divided level of support from stakeholders with some supporting the change while others object to the change
- not supported – the only specific stakeholder feedback was not supportive of the change
- not tested – the proposed change was provided in a written submission lodged after the forum and therefore other stakeholders have not had the opportunity to consider it

Synergy has generally reserved its view on the merit of the proposed changes ahead

| ID | AQP clause | Proposed Change | Stakeholder Feedback |
|-----|-------------------------|---|----------------------|
| 1 | 24.2 | Amend Clause 24.2 so that in a situation where spare capacity 'becomes available' the available capacity can be offered to applicants on a first come first served (priority date) basis. | Potential support |
| 2 | NEW | Clause to be developed that sets out provisions and criteria (conditions) that deems an application as dormant and hence may be withdrawn. Potentially insert a clause based on that previously included in the AA2 AQP. | Potential support |
| New | Priority date | The priority date should not impede generators that are ready to proceed with a constrained connection via the GIA from doing so. | Not opposed |
| New | NEM Access Model | The AQP should not impede adoption of a NEM-like constrained access model during AA4 | Not tested |
| New | Application Fee | It is suggested that the application fee include a significant deposit linked to the size of the generation/load development to discourage applications being made to block other potential users | Not opposed |
| 3 | 24.6 | Remove a time bound reference - include wording that states an intent to process as quickly as is reasonable and prudent. | Mixed Support |
| New | Delayed model provision | The requirement for detailed generator models at the application stage should be relaxed as often at that stage the equipment provider is yet to be selected and therefore detailed modelling information is not available. | Not tested |

| ID | AQP clause | Proposed Change | Stakeholder Feedback |
|-----|----------------------|--|----------------------|
| New | Delete 3.8 | Clause 3.8 should be removed or provision made to allow its removal during AA4 to allow a customer to take electricity from more than one supplier (e.g. a renewable generator and back-up supplier when the renewable generation is not available) | Not tested |
| 4 | NEW | Allow opt out mechanisms at the NOI and PAO stages that enables the connection application to retain its priority date, similar to the option they have at other times under 24.1 (b2). | Not opposed |
| 5 | NEW | Amend AQP to include clauses setting out the mechanism for obtaining funding for undertaking studies prior to issuing a NOI. | Not opposed |
| 6 | 24.8 and Definitions | Add to 24.8 and amend the defined term “spare capacity” to consider forecast natural load growth | Not opposed |
| 7 | 24A.2 | Remove the clause in its entirety to avoid giving preference to applicants that are successful in a tender process. Leave the resolution to the parties developing the terms of the tender. Such that the AQP is agnostic to the purpose behind the application. | Not opposed |
| 8 | 20.3b and 16.5 | Amend clause 20.3b to enable all competing applicants the right to object to an applicant seeking an applicant specific solution. | Not opposed |
| 9 | 18.1 | Amend clause to make a preliminary assessment mandatory, unless agreed by Western Power. | Not opposed |
| 10 | 24.5 | Additional sub-clause to state that the application will be deemed withdrawn if no response is received within stated timeframes. | Not opposed |
| 11 | NEW | When there is no potential to provide access offers to members of a CAG, Western Power can disband the CAG. | Not opposed |
| 12 | 24.6C | Amend title as proposed | Not opposed |
| 13 | 24.2 and 24.4 | Standardised wording of clauses 24.2 and 24.4. | Not opposed |
| 14 | 13 | The basis on which exit points are assessed as being contestable is to be aligned with the Electricity Corporations (Prescribed Customer) Order 2007. | Not opposed |
| 15 | NEW | Address ambiguity in AQP that is the cause of this misconception by making it clear that the AQP does not allow the transfer of unused capacity to another user – refer to the Transfer and Relocations Policy. | Not opposed |

| ID | AQP clause | Proposed Change | Stakeholder Feedback |
|----|--|--|----------------------|
| 16 | 14.4 | Drafting should clarify that consent is required from the existing retailer. | Not opposed |
| 18 | NEW | Clarify in Part A that: <ul style="list-style-type: none"> the AQP applies to any application for covered services does not apply to property developers, as they are not seeking a covered service where an application is not competing then a simple process applies | Not opposed |
| 19 | Clause 2.1 Definitions: definition of "confidential information" | Clause 2.1 'Definitions' to be amended such that the following information is not confidential and hence may be provided to third parties without seeking consent: | Not opposed |
| 20 | 7.4 | Clarify that clause 7.4 applies to connection applicants as well as transfer applicants | Not opposed |

Recommendations

The following recommendations are made regarding the development of revisions for the AQP for the AA4 period, drawing on the material provided through the stakeholder consultation:

1. In developing the detailed drafting to implement the proposed changes specific consideration should be given to the requests for additional clarity raised in the Synergy submission.
2. In developing the detailed drafting to implement the proposed changes the analysis of stakeholder feedback presented in section 5 should be considered.
3. Detailed drafting of proposed changes should be made available for stakeholders. The time constraints for the AA4 submission may prevent detailed drafting being released ahead of the submission being provided to the ERA.
4. A key issue for stakeholders was to understand how the AQP will interact with applicants wishing to establish a constrained access offer enabled by the GIA solution. GHD understands this will be a non-reference service. Western Power should consider whether any revision to the AQP is required to provide this clarity. It appears that elements of the AQP will apply as new connection points will need to be established but it is probably the case that these connections are viewed as not competing and therefore many of the provisions in the AQP may not be triggered. Creating a process flow diagram that demonstrates the path through the AQP processes that a GIA enabled connection is expected to take may add significant value for connection applicants and clarify the need for any change to the AQP.
5. All changes that are classified as not opposed or potentially supported appear to have sufficient stakeholder support to proceed with development of detailed drafting to implement the changes.
6. Changes classified as not tested should give careful consideration as stakeholders have not had the opportunity to provide feedback on those changes. Of those in this category GHD notes that the suggestion to delay to the requirement to provide detailed models is not consistent with the approach in the NEM and may impede Western Power's ability to assess the impact of the proposed generator on the network.
7. Western Power should reconsider whether to proceed with changes classified through the analysis of stakeholder feedback as not supported or having mixed support.

2. Introduction

Purpose and Context

As part of Western Power's Access Arrangements 4 (AA4) submission to the Economic Regulation Authority (ERA), Western Power is reviewing its Application Queuing Policy (AQP). The AQP is one of a suite of policies and processes that manage the connection of loads and generators to Western Power's network.

GHD Advisory on behalf of Western Power initiated a stakeholder consultation process to engage with its clients and potential clients with respect to the proposed changes to the AQP. Specifically Western Power looked to:

1. Obtain feedback and commentary on the proposed 20 changes set out in the briefing paper (Appendix A)
2. Seek feedback on other areas or aspects of the AQP and the processes governed by the AQP that merit refining and or on gaps that Western Power needs to take into consideration in this review

This consultation process was confined to the AQP, and was not intended to cover all aspects of the connection processes for load and generators to Western Power's network.

Report Structure

This report is set out as follows:

1. Method – presenting our approach
2. Results – collating stakeholder feedback
3. Analysis – presenting our analysis of stakeholder concerns raised in stakeholder feedback
4. Recommendations – summarising key recommendations to address feedback and progress the AA4 AQP



3. Method

GHD Advisory's approach to this study was conducted as follows:

Stage 1 – Assessment of required changes to AQP

We assessed, reviewed and confirmed with Western Power the required changes to the AQP to achieve compliance with the Electricity Networks Access Code (Access Code) for AA4. We documented these changes and produced a briefing paper to guide and inform stakeholders on the proposed changes and the consultation process.

Stage 2 – Stakeholder Engagement Stakeholder analysis and Identification

The first step of this stage involves the identification of the various stakeholder groups who have direct experience and interest in the operation of the processes documented in the AQP. Those stakeholders were the target audience for the AQP consultation.

Stakeholder Forums

A stakeholder forum was held at Western Power's offices in Perth on 3 May 2017. Stakeholders were given the opportunity to provide input into the review process through a structured forum. Invitees were provided with a briefing paper beforehand to appraise stakeholders of the proposed changes to the AQP.

One-on-one interviews

Stakeholders were invited to register for one-on-one interviews so they could provide additional feedback on the changes. One-on-one interviews provided the opportunity for GHD to explore issues more deeply and to identify issues that may not be revealed during the forums.

One-on-one interviews were conducted on 4 May 2017.

In order to demonstrate a fair and equitable representation of consultation the team also invited stakeholders to register for telephone interviews to extend our reach into the more remote regions of the network geography.

Written submissions

Stakeholders were provided with opportunity to submit a written submission detailing their input into the review process.

Written submissions remained open to 19 May 2017.

The AQP stakeholder engagement process aimed to:

- explain the proposed AQP changes including the issues being addressed by each of the AQP revisions;
- provide stakeholders with an opportunity to understand the issues and the implications of the proposed changes; and
- capture feedback on the proposed revisions to the AQP.

The image shows a digital registration form titled "AQP Review Face to Face Interviews". The form is set against a light beige background with a teal border. At the top, it says "Sign up here to request a face-to-face interview to provide feedback to the AQP Review". Below this, it provides details: "Date: 4 May 2017" and "Venue: Western Power Offices, 363 Wellington Street Perth WA 6842". The form includes several input fields: "Email Address", "Contact number", "First Name", "Last Name", and "Organisation". Under the "Preferred Time" section, there are five radio button options: "9:30 - 10:30 am", "11:00 am - 12:00 pm", "12:30 pm - 1:30 pm", "2:00 pm - 3:00 pm", and "3:30 pm - 4:30 pm". At the bottom of the form is a "Subscribe to list" button.

Figure 1 Interview Registration Form

The purpose of this process was to:

- validate that the proposed changes address key issues for stakeholders with the existing AQP;
- identify any other opportunities for improvement and
- ensure stakeholders are well informed of the proposed changes.

A website (www.aqpreview.net) was created to allow stakeholders to be part of the AQP engagement process. By accessing the website stakeholders could:

- obtain copies of the briefing paper
- register to participate in consultation activities and
- provide feedback on the proposed revisions and other areas of the AQP.



Figure 2 AQP Review Website

To capture feedback on the proposed regions to the AQP an online questionnaire (Appendix B) and an open-ended feedback form was developed using Survey Monkey. Figure 3 below outlines the structure of the questionnaire.

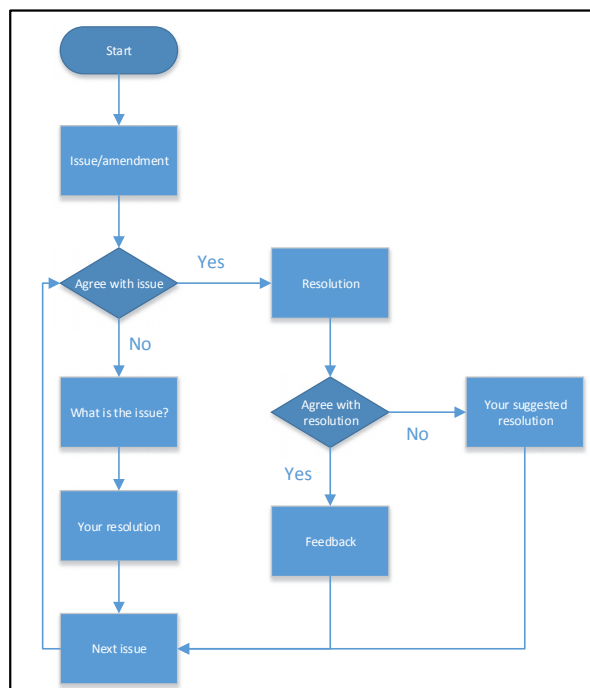


Figure 3 Questionnaire Structure

The feedback gathered during the consultation process is intended to assist Western power to develop the revised AQP that will be submitted to the AER with the AA4 proposal.

4. Results

Stakeholder Forum

Table 4-1 lists the stakeholder feedback received via the AQP forum held on 3 May 2017. To maximise the value of the forum, it focussed on the proposed changes that were classified as making material or minor changes to the AQP. The other proposed changes are administrative in nature.

Table 4-1 Stakeholder Feedback from Forum

| ID | AQP clause | Summary of Issue | Proposed resolution | Stakeholder Forum Feedback |
|------------------------------------|------------|---|--|---|
| Connection applications - material | | | | |
| 1 | 24.2 | <p>The AQP only supports capacity to be provided to CAG members where that capacity has been developed by shared works (in response to the connection applications).</p> <p>Occasionally, spare capacity becomes available without any customer funded shared works e.g. through growth driven network augmentation or through a reduction in existing contracted load/generation capacity. As the formation of a CAG relies on the identification of shared works, the CAG mechanism cannot be used to release this capacity to CAG members.</p> | <p>Amend Clause 24.2 so that in a situation where spare capacity 'becomes available' the available capacity can be offered to applicants on a first come first served (priority date) basis.</p> | <ol style="list-style-type: none">1. General support for a process that allows spare capacity to be allocated, with divided views regarding the merit of a priority date based approach to allocating capacity2. Priority date.<ol style="list-style-type: none">a. Proposed change allocates capacity using priority date to establish order in which offers are madeb. New applicants should be made aware of their priority date and where there applicant sits with respect to others in terms of priority date.3. Some supported allocating capacity to those most ready to proceed, while others supported use of priority date. |

| ID | AQP clause | Summary of Issue | Proposed resolution | Stakeholder Forum Feedback |
|---------------------------------|------------|---|--|---|
| | | | | <ol style="list-style-type: none"> 4. Applicants should demonstrate “most ready” through financial commitment. 5. Clarity sought regarding whether capacity would be distributed across all connection applicants or only CAG members. |
| 2 | NEW | <p>Applicants can remain in the process indefinitely although being dormant, in some cases having had no contact with Western Power for many years.</p> <p>This impacts on the Priority Date mechanism and hence release of capacity to applicants ready willing and able but that have a later Priority Date.</p> <p>It also impacts the objections process as Western Power is obliged to provide all competing applicants with an opportunity to object to an applicant specific solution.</p> | <p>Clause to be developed that sets out provisions and criteria (conditions) that deems an application as dormant and hence may be withdrawn.</p> <p>Potentially insert a clause based on that previously included in the AA2 AQP.</p> | <ol style="list-style-type: none"> 1. It is important to tidy up the list. 2. There should be a mechanism that allows applicant to stay in the process 3. If there are several applications there should be a mechanism to determine which are viable/real. 4. Suggestion that financial commitment be demonstrated to avoid dormancy. ASX listing and notices could also be used in the dormancy assessment 5. Introduce a timeframe for no progress that might trigger classification as a dormant application. 6. Criteria should consider the applicant's intent to progress the project. 7. |
| Connection applications - minor | | | | |
| 3 | 24.6 | It is not feasible to include all studies, design work, approvals and other processing work required to provide an access offer within 30 business days of | Remove a time bound reference - include wording that states an intent to process as quickly as is reasonable and prudent. | <ol style="list-style-type: none"> 1. It is still important to include a timeframe as that is valuable information for applicants. |

| ID | AQP clause | Summary of Issue | Proposed resolution | Stakeholder Forum Feedback |
|----|------------|---|---|---|
| | | reviewing responses to Preliminary Access Offers (PAO). | | <ol style="list-style-type: none"> Western Power confirmed that timeline will depend on the size and complexity of applications. Suggestion that clause be amended to require Western Power to advise the expected timeframe to provide the access offer based on a reasonable assessment of the size and complexity of the network investment required to provide the connection.. |
| 4 | NEW | <p>In responding to a notice of intention to prepare a preliminary access offer (NOI) or a PAO, there is no option for a connection applicant in a CAG to elect to opt out of the CAG process (maintaining their priority date) with the intention of progressing in a new CAG solution when it is formed.</p> <p>If they do not wish to accept the NOI / PAO the available options are only to progress as an applicant specific solution or withdraw the application.</p> | Allow opt out mechanisms at the NOI and PAO stages that enables the connection application to retain its priority date, similar to the option they have at other times under 24.1 (b2). | No feedback |
| 5 | NEW | <p>AQP does not identify any mechanism for funding studies required to prepare a NOI.</p> <p>These may be required to provide a reasonable level of information to CAG applicants so that they can make an informed decision about accepting an NOI</p> | Amend AQP to include clauses setting out the mechanism for obtaining funding for undertaking studies prior to issuing a NOI. | <ol style="list-style-type: none"> The mechanism should only be triggered in the event that Western Power incurs a material amount of additional cost in completing the steps required to prepare the NOI Fees should be presented to the CAG members |

| ID | AQP clause | Summary of Issue | Proposed resolution | Stakeholder Forum Feedback |
|--|----------------------|--|--|---|
| | | and funding the subsequent solution development. | | |
| Connection applications - administrative | | | | |
| 6 | 24.8 and Definitions | Clause 24.8 appears to prevent Western Power including forecast natural load growth and future connections when determining spare capacity. | Add to 24.8 and amend the defined term “spare capacity” to consider forecast natural load growth | <ol style="list-style-type: none"> 1. Immediate and relevant feedback is desirable to assist the applicant’s decision making process. 2. Fees presented to the CAG. |
| 7 | 24A.2 | The current provision regarding a tender process is incompatible with the CAG access regime. | <p>Remove the clause in its entirety to avoid giving preference to applicants that are successful in a tender process.</p> <p>Leave the resolution to the parties developing the terms of the tender. Such that the AQP is agnostic to the purpose behind the application.</p> | No feedback |
| 8 | 20.3b and 16.5 | <p>Western Power is obliged to provide competing applicants that were ‘within the same competing applications group’ an opportunity to object to an applicant specific solution.</p> <p>Under Clause 16.5 however, an applicant may, at the time of making a connection application, elect that the connection application is to be processed as an applicant-specific solution and is not to be</p> | Amend clause 20.3b to enable all competing applicants the right to object to an applicant seeking an applicant specific solution. | <ol style="list-style-type: none"> 1. Demand site solutions 2. Constrains innovation 3. Peer to peer trading |

| ID | AQP clause | Summary of Issue | Proposed resolution | Stakeholder Forum Feedback |
|----|------------|--|---|----------------------------|
| | | <p>considered as part of a competing applications group.</p> <p>This causes a technical problem where the applicant specific solution may cause an impediment to Western Power providing the covered service sought by some CAG applicants, however as the applicant specific solution application was never included in the CAG they would not be provided the opportunity to object.</p> <p>The change proposed is to provide the right to object to those that should have the right to object.</p> | | |
| 9 | 18.1 | <p>The current wording sets up a potential expectation from the customer that the preliminary assessment may not be required - when in practice, it is always required.</p> <p>The preliminary assessment typically provides an assessment of network connection options, and indicative costs and timeframes.</p> | Amend clause to make a preliminary assessment mandatory, unless agreed by Western Power. | No feedback |
| 10 | 24.5 | Clause 24.5 details mechanisms for acceptance and rejection but is silent on action/treatment if an applicant doesn't | Additional sub-clause to state that the application will be deemed withdrawn if no response is received within stated timeframes. | No feedback |



| ID | AQP clause | Summary of Issue | Proposed resolution | Stakeholder Forum Feedback |
|----|---------------|--|---|----------------------------|
| | | respond within stated timeframes to a preliminary access offer. | | |
| 11 | NEW | Whilst members of a CAG may have their CAG contract terminated, there is no mechanism to terminate / disband the CAG itself. | When there is no potential to provide access offers to members of a CAG, Western Power can disband the CAG. | No feedback |
| 12 | 24.6C | Title not correct - amend to 'Exceeding Maximum Levels' to reflect clause | Amend title as proposed | No feedback |
| 13 | 24.2 and 24.4 | Drafting error - inconsistent wording between two clauses that should be common | Standardised wording of clauses 24.2 and 24.4. | No feedback |

| ID | AQP clause | Summary of Issue | Proposed resolution | Stakeholder Forum Feedback |
|--|------------|---|---|--|
| Transfer applications - material | | | | |
| 14 | 13 | The Contestability Assessment is somewhat ambiguous in the AQP - as to whether the assessment is connection point by connection point or assessed on the basis of an end customers portfolio of connection points. | The basis on which exit points are assessed as being contestable is to be aligned with the Electricity Corporations (Prescribed Customer) Order 2007. | No feedback |
| Transfer applications - minor | | | | |
| 15 | NEW | <p>There is a misconception that the AQP enables capacity currently contracted to one user being temporarily made available to another user. This is not the purpose of the AQP and the AQP has no mechanism to achieve this.</p> <p>Capacity transfers and relocations are dealt with under the Transfer and Relocations Policy.</p> | Address ambiguity in AQP that is the cause of this misconception by making it clear that the AQP does not allow the transfer of unused capacity to another user – refer to the Transfer and Relocations Policy. | <p>While the matter might be best dealt with in the transfer and relocations policy feedback provided suggested policies should:</p> <ol style="list-style-type: none"> 1. Not inhibit implementation of demand side solutions 2. Not constrain innovation 3. Not impede peer to peer trading |
| Transfer applications - administrative | | | | |
| 16 | 14.4 | The current wording is ambiguous as to whether consent is required from the existing ETAC holder for the splitting of a connection point - in practice the existing ETAC holder must consent. | Drafting should clarify that consent is required from the existing retailer. | No feedback |

| ID | AQP clause | Summary of Issue | Proposed resolution | Stakeholder Forum Feedback |
|------------------------------------|------------|---|---|----------------------------|
| 17 | 9.1 (c) | Under AQP there is a potential for a mismatch between the covered service and the ability of the connection point to provide that covered service. A transfer application may expose these mismatches. This issue arose with a customer on a HV connection being on a LV tariff and that tariff service not being able to be transferred during a change in retailer. | Clause to be amended such that Western Power is not obliged to offer the same service through a transfer arrangement as was previously offered if the connection point is not eligible to provide that service. | No feedback |
| Common provisions - material | | | | |
| 18 | NEW | <p>AQP does not specifically state that it is only applicable to applications for covered services. This may create confusion regarding any relevance for property developers not seeking a covered service.</p> <p>The AQP Part C deals with 'Where there are competing applications' and the 'Applicant-specific solution option' but does not refer to connection applications that are 'not competing'.</p> | <p>Clarify in Part A that:</p> <ul style="list-style-type: none"> the AQP applies to any application for covered services does not apply to property developers, as they are not seeking a covered service where an application is not competing then a simple process applies | No feedback |
| Common provisions - administrative | | | | |

| ID | AQP clause | Summary of Issue | Proposed resolution | Stakeholder Forum Feedback |
|----|--|--|---|----------------------------|
| 19 | Clause 2.1 Definitions: definition of "confidential information" | Clients consider project specific information to be confidential as a matter of course. AQP's definition of confidential information requires that the client <u>specifies</u> which of the information it provides is confidential. From time to time Western Power has been requested to disclose certain project information to third parties. Western Power proposes to make it clearer as to which project information is not confidential. | Clause 2.1 'Definitions' to be amended such that the following information is not confidential and hence may be provided to third parties without seeking consent: <ul style="list-style-type: none"> - Zone substation (if applicable) - Generation type - Capacity sought - Region - Priority date | No feedback |
| 20 | 7.4 | Clause 7.4 of the AQP currently only allows transfer applicants (and not connection applicants) to mutually agree to depart from the AQP (subject to no impediment to other applicants) | Clarify that clause 7.4 applies to connection applicants as well as transfer applicants | No feedback |

Feedback – Interviews and Written Submissions

5. Table 4.2 below summarises the feedback received from stakeholders via written submission and face-to-face interview. Feedback was received from:
 - Lacour Energy (face-to-face)
 - Perth Energy (written)
 - Synergy (written)
6. The feedback received is organised by the 20 revisions proposed by Western Power using the numbering convention in the Briefing Paper. All three stakeholders raises additional issues to the 20 addressed by the proposed changes put forward by Western Power. The new issues were generally raised through stakeholder feedback on specific proposals in the briefing paper. The new issues are therefore listed immediately following the relevant issue from the briefing paper

Table 4-2 Interview and Written Submissions

| ID | AQP Clause | Party | Feedback on proposed change |
|-----------|------------|---------------|---|
| 1 | 24.2 | Lacour Energy | The priority date should not be allowed to impede the ability of generators that are most able to proceed with a connection from doing so and accessing spare capacity. Spare capacity should be allocated to those most able to proceed. |
| 1 | 24.2 | Perth Energy | Supports the proposed change to the AQP to allow spare capacity to be allocated to applicants on a first-come-first – served basis |
| 1 | 24.2 | Synergy | The proposed change may be unnecessary. Further detail of proposed drafting is requested |
| 2 | Dormancy | Perth Energy | Supports provisions to remove dormant applicants but request the test be carefully considered to ensure that genuine applicants delayed through no fault of the applicant are not classified as dormant |
| 2 | Dormancy | Synergy | The proposed change may be unnecessary as WP has sufficient rights to withdraw applications. Further detail of proposed drafting is requested |
| New issue | | Lacour Energy | The priority date should not impede the ability of generators that are ready to proceed with a constrained connection enabled by the Generator Interim Access (GIA) solution from doing so. |
| New issue | | Lacour Energy | AQP should not impede a move to a NEM like constrained access model during the AA4 period |
| New Issue | | Perth Energy | Supports the posting of a significant deposit, commensurate with the size of a proposed generator or customer, to discourage applications being made to block other potential users |
| 3 | 24.6 | Perth Energy | The proposed change to remove the 30 day target is supported as it would avoid applicants forming an unrealistic view of the time it will take for Western Power to progress their connection. The change should be accompanied by a relaxation of the requirement to provide detailed generator modelling information early in the connection process as this is an unnecessarily burdensome step at the early stages of the connection process. |
| 3 | 24.6 | Synergy | Does not support a change that leads to an open ended proposal that may potentially require arbitration. Further detail of proposed drafting is requested including revisions to Appendix B of the AQP |

| ID | AQP Clause | Party | Feedback on proposed change |
|---------------|-------------|--------------|--|
| New issue | | Perth Energy | The requirement for detailed generator models at the application stage should be relaxed as often at that stage the equipment provider is yet to be selected and therefore detailed modelling information is not available. |
| New Issue 3.8 | | Perth Energy | Clause 3.8 should be removed or provision made to allow its removal during AA4 to allow a customer to take electricity from more than one supplier (e.g. a renewable generator and back-up supplier when the renewable generation is not available) |
| 4 | New | Synergy | Further detail of proposed drafting is requested. While there may be merit in the proposed change Synergy is concerned that a change might potentially prejudice another party's rights in respect of an existing CAG |
| 5 | 24.8 | Synergy | Further detail of proposed drafting is requested – change may not be required |
| 6 | 24.8 | Synergy | Further detail of proposed drafting is requested – change may not be required |
| 7 | 24A.2 | Synergy | Further detail of proposed drafting is requested |
| 8 | 20.3b, 16.5 | Synergy | Further detail of proposed drafting is requested |
| 9 | 18.1 | Synergy | Further detail of proposed drafting is requested to clarify whether a preliminary assessment will be required even for a PV application < 5kW |
| 10 | 24.5 | Synergy | Further detail of proposed drafting is requested as it is not clear why current provisions under clauses 3.10 and 15 are insufficient |
| 11 | New | Synergy | Further detail of proposed drafting is requested including explanation of the scenarios where WP considers there is no potential to provide access |
| 12 | 24.6C | Synergy | Change is supported |
| 13 | 24.2,24.4 | Synergy | Further detail of proposed drafting is requested |
| 14 | 13 | Synergy | Further detail of proposed drafting is requested |
| 15 | New | Synergy | Further detail of proposed drafting is requested. Synergy is concerned that the proposed drafting may create regulatory uncertainty |
| 16 | 14.4 | Synergy | Further detail of proposed drafting is requested - change may not be necessary |
| 17 | 19.1(c) | Synergy | Further detail of proposed drafting is requested. Synergy does not support the proposed change as the root cause of the issue is the network operator not complying with its obligations under the ETAC and Metering Code |
| 18 | New | Synergy | Further detail of proposed drafting is requested- change may not be necessary as clause 14 and other areas of the AQP make it clear that applications are in respect of reference and non-reference (covered services). It appears that the proposed change is intended to allow some access schemes to not comply with the AQP. Further information is requested to understand the schemes that would not need to comply with the AQP |
| 19 | 2.1 | Synergy | While the change may be warranted further detail of proposed drafting is requested in particular to clarify any impact on the transfer provisions in the AQP |
| 20 | 17.4 | Synergy | While the change may be warranted, further detail of proposed drafting is requested to understand how parties may contractually vary from the AQP in respect of an application made under the AQP. |

5. Analysis

The following table presents an analysis of the feedback for each proposed change listed in the briefing paper and the new issues raised by stakeholders. In the following table we have classified each of the proposed changes by the level of stakeholder support by applying the following ratings:

- not opposed – none of the submissions received opposed the proposed change
- potential support – some stakeholders did not oppose the change while others have reserved their position until they have reviewed the detailed drafting
- mixed support – there is a divided level of support from stakeholders with some supporting the change while others object to the change
- not supported – the only specific stakeholder feedback was not supportive of the change
- not tested – the proposed change was provided in a written submission lodged after the forum and therefore other stakeholders have not had the opportunity to consider it

Synergy has generally reserved its view on the merit of the proposed changes ahead of reviewing the detailed drafting. In some instances Synergy has identified concerns that would need to be addressed by the detailed drafting to gain their support

| ID | AQP clause | Proposed Change | Stakeholder Feedback | Discussion |
|----|------------|---|----------------------|---|
| 1 | 24.2 | Amend Clause 24.2 so that in a situation where spare capacity 'becomes available' the available capacity can be offered to applicants on a first come first served (priority date) basis. | potential support | While there was general support for finding an appropriate mechanism to allocate spare capacity to applicants there were mixed views on the merit of using the priority date to achieve the allocation. Some stakeholders favour capacity being allocated on the basis that those most able to proceed receive the first offer of capacity. |
| 2 | NEW | Clause to be developed that sets out provisions and criteria (conditions) that | potential support | There is some support for the inclusion of a clause that allows and application to be determined as dormant and removed. However stakeholders believe the criteria for assessing dormancy needs to be |

| ID | AQP clause | Proposed Change | Stakeholder Feedback | Discussion |
|-----|------------------|---|----------------------|---|
| | | <p>deems an application as dormant and hence may be withdrawn.</p> <p>Potentially insert a clause based on that previously included in the AA2 AQP.</p> | | <p>considered carefully. The submissions identify potential criteria that could be applied in this assessment. Synergy has suggested that WP already has sufficient rights to withdraw applications. GHD has not been able to identify a provision in the AQP that would provide this right. The AQP has provisions that allow applicants to withdraw their applications and provisions that allow applications to be deemed as being withdrawn if certain activities are not completed, however there do not appear to be specific provisions that allow Western Power to form a view that an applicant is dormant and therefore deemed to be withdrawn.</p> |
| New | Priority date | The priority date should not impede generators that are ready to proceed with a constrained connection via the GIA from doing so. | Not opposed | <p>While no feedback opposed this idea. It is unclear whether specific changes are required to the AQP. The need for a change will depend on advice on whether the AQP requires the priority date to be used in processing connection applications and making connection offers for non-reference constrained access services.</p> |
| New | NEM Access Model | The AQP should not impede adoption of a NEM-like constrained access model during AA4 | Not tested | <p>While no feedback opposing the idea was received it is unclear that any change to the AQP is justified. GHD expects that adopting a NEM style of constrained access model may require a range of regulatory changes and those changes could be scoped to address this issue.</p> |
| New | Application Fee | It is suggested that the application fee include a significant deposit linked to the size of the generation/load development to discourage applications being made to block other potential users | Not opposed | <p>The Access Code requires Western Power to develop a price list which includes application fees. This change could be considered in developing the revised pricing methodology document and price list for the AA4 submission. This work may benefit from an investigation of the fees charged by NEM based NSPs.</p> |

| ID | AQP clause | Proposed Change | Stakeholder Feedback | Discussion |
|-----|-------------------------|---|----------------------|---|
| 3 | 24.6 | Remove a time bound reference - include wording that states an intent to process as quickly as is reasonable and prudent. | Mixed Support | The main issue of concern is having no timeframe at all which may create an open-ended process and uncertainty. Stakeholder feedback suggested that consideration be given to including some guidance in the AQP as to what timeframe could be expected. This timeframe could be based on the size and complexity of the project. Another option proposed was to require Western Power to provide advice on the expected timeframe on a case-case basis. GHD notes that clause 3.12 already requires Western Power to process an application expeditiously. Synergy did not support the change as it may lead to an open ended process potentially requiring arbitration. |
| New | Delayed model provision | The requirement for detailed generator models at the application stage should be relaxed as often at that stage the equipment provider is yet to be selected and therefore detailed modelling information is not available. | Not tested | This proposed change has not been widely considered by other stakeholders therefore there is uncertainty regarding the level of support. It is noted that within the NEM it is common for detailed models to be provided at the connection application stage, hence the existing timing for model provision appears to be consistent with the NEM arrangements. Delaying the requirement to provide detailed models may impede Western Power's ability to assess the impact of the proposed generator on the performance of the power system. There may be merit in providing participants to provide generic models in the situation where the specific provider is yet to be chosen provided the applicant recognises the need to provide updated models matching the ordered plant well ahead of commissioning and there is a risk that if the updated models provide significantly different generator performance their connection may be delayed while the impact on the power system is reassessed. Implementing this sort of change may require changes to the technical rules and model requirements rather than the AQP |

| ID | AQP clause | Proposed Change | Stakeholder Feedback | Discussion |
|-----|----------------------|---|----------------------|--|
| New | Delete 3.8 | Clause 3.8 should be removed or provision made to allow its removal during AA4 to allow a customer to take electricity from more than one supplier (e.g. a renewable generator and back-up supplier when the renewable generation is not available) | Not tested | No action is required if Western power is satisfied that arrangements exist to allow the AQP to be modified within the AA4 period if necessary |
| 4 | NEW | Allow opt out mechanisms at the NOI and PAO stages that enables the connection application to retain its priority date, similar to the option they have at other times under 24.1 (b2). | Not opposed | |
| 5 | NEW | Amend AQP to include clauses setting out the mechanism for obtaining funding for undertaking studies prior to issuing a NOI. | Not opposed | |
| 6 | 24.8 and Definitions | Add to 24.8 and amend the defined term “spare capacity” to consider forecast natural load growth | Not opposed | No significant issues identified. |
| 7 | 24A.2 | Remove the clause in its entirety to avoid giving preference to applicants that are successful in a tender process. Leave the resolution to the parties developing the terms of the tender. Such that the AQP is agnostic to the purpose behind the application. | Not opposed | No significant issues identified. |

| ID | AQP clause | Proposed Change | Stakeholder Feedback | Discussion |
|----|----------------|---|----------------------|---|
| 8 | 20.3b and 16.5 | Amend clause 20.3b to enable all competing applicants the right to object to an applicant seeking an applicant specific solution. | Not opposed | |
| 9 | 18.1 | Amend clause to make a preliminary assessment mandatory, unless agreed by Western Power. | Not opposed | No significant issues identified. |
| 10 | 24.5 | Additional sub-clause to state that the application will be deemed withdrawn if no response is received within stated timeframes. | Not opposed | Detailed drafting to consider whether clauses 3.10 and 15 sufficient? |
| 11 | NEW | When there is no potential to provide access offers to members of a CAG, Western Power can disband the CAG. | Not opposed | No significant issues identified. |
| 12 | 24.6C | Amend title as proposed | Not opposed | No significant issues identified. |
| 13 | 24.2 and 24.4 | Standardised wording of clauses 24.2 and 24.4. | Not opposed | No significant issues identified. |

| ID | AQP clause | Proposed change | Broadly Supported/Not opposed? | Discussion |
|----|------------|---|--------------------------------|--|
| 14 | 13 | The basis on which exit points are assessed as being contestable is to be aligned with the Electricity Corporations (Prescribed Customer) Order 2007. | Not opposed | No significant issues identified. |
| 15 | NEW | Address ambiguity in AQP that is the cause of this misconception by making it clear that the AQP does not allow the transfer of unused capacity to another user – refer to the Transfer and Relocations Policy. | Not opposed | No specific issues identified. |
| 16 | 14.4 | Drafting should clarify that consent is required from the existing retailer. | Not opposed | No significant issues identified. |
| 17 | 9.1 (c) | Clause to be amended such that Western Power is not obliged to offer the same service through a transfer arrangement as was previously offered if the connection point is not eligible to provide that service. | Not supported | Synergy does not support this change as the root cause of the issue is the network operator not complying with its obligations under the ETAC and Metering Code. Consideration of the ETAC and Metering Code is outside the scope of the GHD engagement. |

| ID | AQP clause | Proposed Change | Broadly Supported/Not opposed? | Discussion |
|----|--|---|--------------------------------|---|
| 18 | NEW | Clarify in Part A that: <ul style="list-style-type: none"> the AQP applies to any application for covered services does not apply to property developers, as they are not seeking a covered service where an application is not competing then a simple process applies | Not opposed | No significant issues identified. |
| 19 | Clause 2.1 Definitions: definition of "confidential information" | Clause 2.1 'Definitions' to be amended such that the following information is not confidential and hence may be provided to third parties without seeking consent: <ul style="list-style-type: none"> Zone substation (if applicable) Generation type Capacity sought Region Priority date | Not opposed | Drafting should clarify impact on transfer provisions of the AQP. |
| 20 | 7.4 | Clarify that clause 7.4 applies to connection applicants as well as transfer applicants | Not opposed | No significant issues identified. |

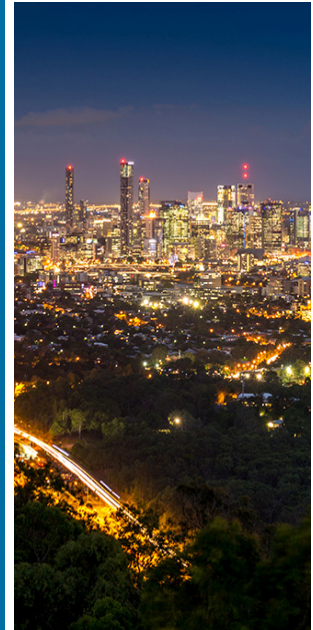
6. Recommendations

The following recommendations are made regarding the development of revisions for the AQP for the AA4 period, drawing on the material provided through the stakeholder consultation:

1. In developing the detailed drafting to implement the proposed changes specific consideration should be given to the requests for additional clarity raised in the Synergy submission.
2. In developing the detailed drafting to implement the proposed changes the analysis of stakeholder feedback presented in section 5 should be considered.
3. Detailed drafting of proposed changes should be made available for stakeholders. The time constraints for the AA4 submission may prevent detailed drafting being released ahead of the submission being provided to the ERA.
4. A key issue for stakeholders was to understand how the AQP will interact with applicants wishing to establish a constrained access offer enabled by the GIA solution. GHD understands this will be a non-reference service. Western Power should consider whether any revision to the AQP is required to provide this clarity. It appears that elements of the AQP will apply as new connection points will need to be established but it is probably the case that these connections are viewed as not competing and therefore many of the provisions in the AQP may not be triggered. Creating a process flow diagram that demonstrates the path through the AQP processes that a GIA enabled connection is expected to take may add significant value for connection applicants and clarify the need for any change to the AQP.
5. All changes that are classified as not opposed or potentially supported appear to have sufficient stakeholder support to proceed with development of detailed drafting to implement the changes.
6. Changes classified as not tested should give careful consideration as stakeholders have not had the opportunity to provide feedback on those changes. Of those in this category GHD notes that the suggestion to delay to the requirement to provide detailed models is not consistent with the approach in the NEM and may impede Western Power's ability to assess the impact of the proposed generator on the network.
7. Western Power should reconsider whether to proceed with changes classified through the analysis of stakeholder feedback as not supported or having mixed support.

Appendices

Appendix A Briefing Paper



Western Power

Applications and Queuing Policy – Briefing Paper

2 May 2017



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1. Purpose

As part of Western Power's Access Arrangement 4 (AA4) submission to the ERA, Western Power is reviewing its Applications and Queuing Policy (AQP). The AQP is one of a suite of policies that manage the connection of loads and generators to Western Power's network.

Western Power has initiated a stakeholder consultation process to engage with its clients and potential clients with respect to the proposed changes to the AQP. Specifically Western Power wishes to:

1. Obtain feedback and commentary on the proposed 20 changes set out in this briefing paper (summarised in Section 4 of the body of this briefing paper)
2. Seek feedback and commentary on other areas or aspects of the AQP and the processes governed by the AQP that stakeholders believe require improvement, so that Western Power can consider those in this review or in subsequent reviews

This consultation process is limited to the AQP, and your experience of such, therefore it is not intended to cover all aspects of the connection processes for load and generators to Western Power's network. However, Western Power will be pleased to receive feedback (for separate consideration) on other elements of the network connection process.

This consultation is distinct from wider consultations Western Power is undertaking in relation to the entire AA4 proposal.

1.1 Invited participants

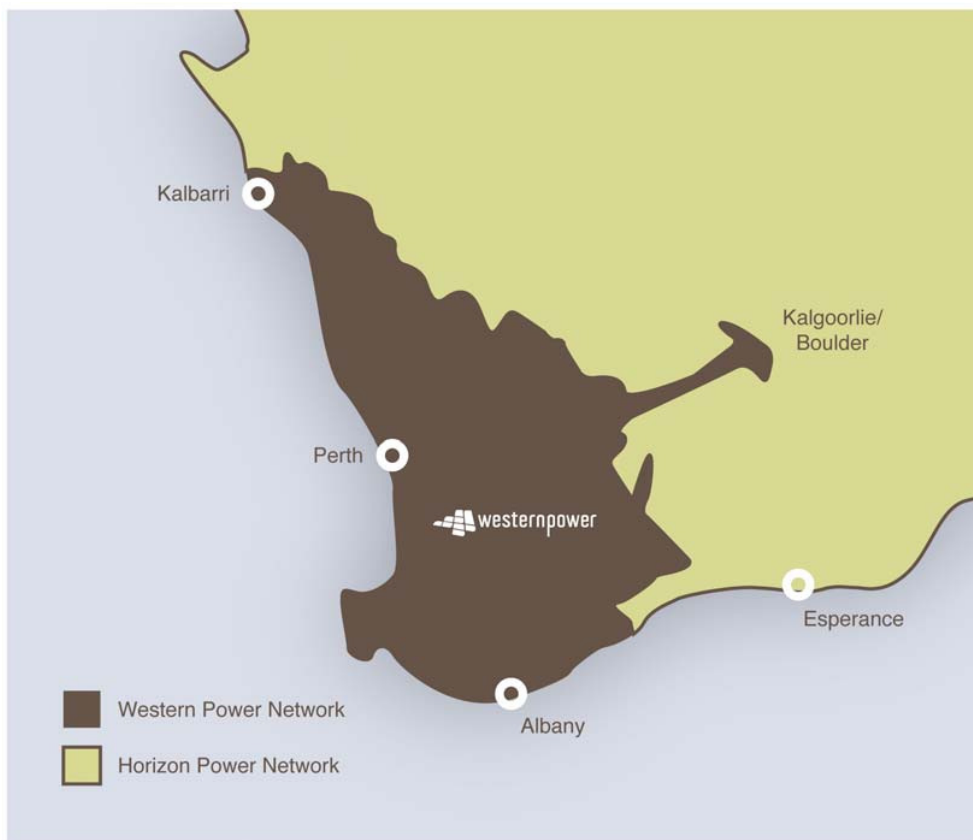
Western Power wishes to engage with:

1. Customers seeking to connect generation plant
2. Customer seeking to connect large loads (>1MW) to the network or upgrade an existing connection that may trigger network works
3. Customers with existing generation plant
4. Customers with existing large load connected to the network
5. Retailers with respect to Part B of the AQP.

2. Background

2.1 The Western Power Network

Western Power owns, operates and maintains the principal electricity network in the south west of Western Australia, delivering power to more than one million customers every day.



Unlike many other electricity network businesses in Australia, Western Power is an integrated transmission and distribution network owner. The diagram below illustrates the essential role the Western Power network provides in connecting electricity customers with sources of electricity supply.



As a natural monopoly, Western Power operates within a highly regulated framework. The Electricity Networks Access Code (Access Code) provides the framework governing the economic regulation of Western Power and how Western Power responds to requests from electricity consumers and generators wishing to gain access to the network, or amend their existing level of access.

Periodically Western Power is required to propose a revised access arrangement for review by the Economic Regulating Authority (ERA). The Access Arrangement includes policies governing the customer connection process one of which is the AQP.

2.2 Connection and Access Framework

Western Power's Access Arrangement is required to include one or more reference services, for each of which there is standard access contract, service standard and associated tariff structure for network services.

Reference services comply with the technical requirements specified in the Technical Rules which implies providing unconstrained access to the network, for both load and generation connections. Unconstrained access implies that sufficient network capacity is provided to ensure that all connected load can be supplied and no generation is constrained due to a lack of network capacity (under credible dispatch scenarios).

A reference service is the default service offered to parties wishing to connect to Western Power. If parties are not prepared to fund the augmentations required to provide an unconstrained connection they may instead elect to receive an offer for a non-reference service. Non-reference services typically involve operational solutions such as load curtailment or generation runback schemes to avoid network augmentations.

2.3 Regulatory Context

The following diagram illustrates the relationship between some of the key regulatory documents associated with the connection and access arrangements applying to the Western Power network. The three principal instruments are:

- the Access Code which is the principal legal authority,
- the AQP required by the Access Code, and
- the Technical Rules.

The Access Code specifies the requirement for the Technical Rules and an Access Arrangement, which is refreshed periodically. The Access Code specifies the required content of the Access Arrangement, which must include the AQP, an Electricity Transfer Access Contract (ETAC), a Contributions Policy, and a Transfer and Relocations Policy that apply for the period of the Access Arrangement.

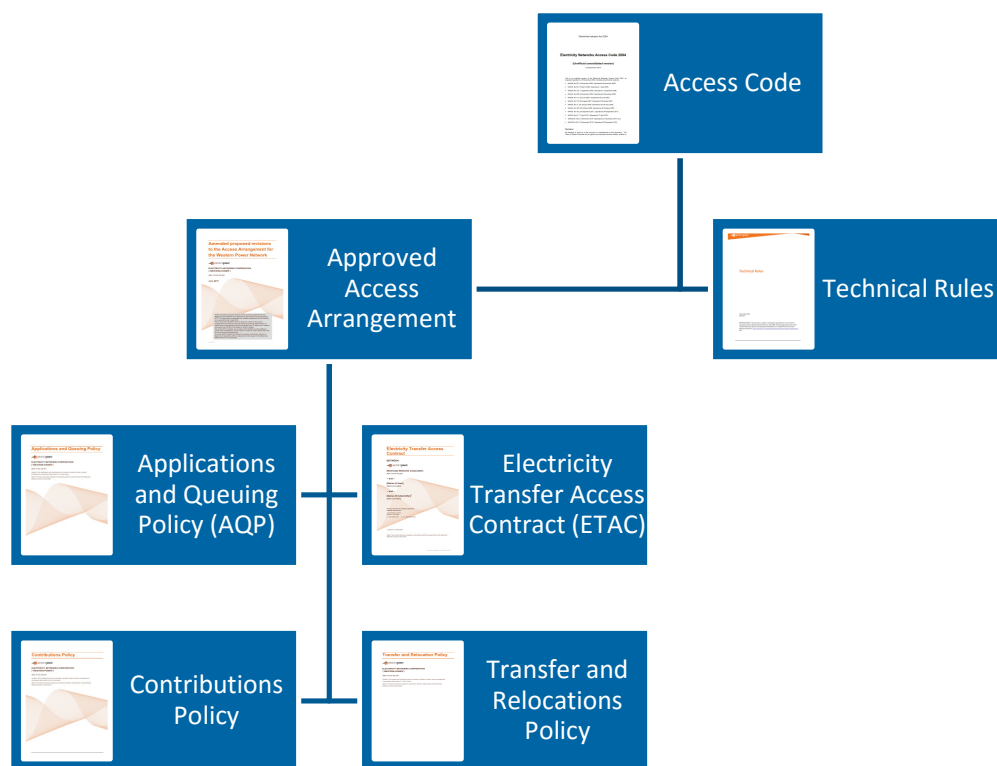


Figure 1 Relationship between key regulatory documents

2.4 AQP Consultation

The development of the Access Arrangement for the next regulatory period (AA4) provides an opportunity for Western Power to propose refinements to the AQP to improve the connection and access process.

Following consultation and engagement with industry in the current Access Arrangement (AA3) period, Western Power has implemented some substantial changes to the connection and access arrangements. Principally, those changes relate to introducing the concept of a competing access group (CAG). A CAG allows connection applicants that compete for the same network capacity behind a given network constraint to be identified and for that group of applicants to share in the cost of developing a network solution capable of addressing the network limitation and allow the level of access sought by the members of the CAG.

Western Power has identified several opportunities to improve the AQP, through interaction with stakeholders and through its application of the AQP during AA3. Western Power is now consulting on those identified opportunities and proposed refinement ahead of submitting a revised AQP to the ERA with the AA4 proposal.

This consultation is distinct from the wider consultations Western Power is undertaking in relation to the entire AA4 proposal.

This briefing paper is intended to inform stakeholders on the AQP consultation, and provide background information on the role of the AQP and the suggested opportunities for improvement.

3. AQP

3.1 Purpose

The AQP governs the way in which applications lodged with Western Power for access to the electricity network are processed. It outlines the processes and timeframes for Western Power to follow when processing the following two types of application for access to the electricity network:

Electricity Transfer Application – an application where a customer seeks to obtain or modify a Western Power service under which the customer may transfer electricity:

- into the network (an entry service)
- out of the network (an exit service)
- into and out of the network (a bidirectional service).

Connection Application – an application that has the potential to require modification to the electricity network.

3.2 Structure and Content

3.2.1 AQP structure

The AQP is structured to separately address the processes applicable to *electricity transfer applications* and *connections applications*. The AQP is structured in three parts:

- Part A provides overview, definitions and process information relevant to both types of applications
- Part B provides information that is only applicable to electricity transfer applications, and
- Part C provides information that is only applicable to connection applications.

3.2.2 AQP content

The AQP applicable during AA3 is considerably different to the AQP that applied during AA2. The most significant revisions reflect the changes necessary to modify Part C to allow for the processing of connection applications via CAGs. The following sections provide an overview of the CAG related processes, as reflected in the current AQP.

3.2.2.1 Access Offers – Contractual arrangements

The contractual arrangement used by Western Power to make Access Offers to its customers is the ETAC. This contract is approved by the ERA, and governs connection to the network and the transfer of electricity at the connection point.

Connection applicants either sign an ETAC with Western Power, or if they use an electricity retailer, then their retailer will need to execute a variation to its ETAC to include the connection applicant's service.

If Western Power is required to undertake any works to connect a connection applicant to the network, the applicant will need to execute an Interconnection Works Contract (IWC).

3.2.2.2 Progressing to a connection application

The AQP defines the various processes that must be followed to progress a connection. Figure 2 provides an overview of the processes. These processes involve making an enquiry and receiving a response. In their response, Western Power will identify the information required to prepare a connection application and then provide initial information regarding the potential constraints that may

impact the proposed connection. Following the lodgement of a complete connection application Western Power will assign a priority date to the application and advise if the application has been sorted into one or more CAGs. A CAG is a group of applications that are competing for access to the same network capacity and the available capacity is less than that required to connect all of the applications in the CAG.

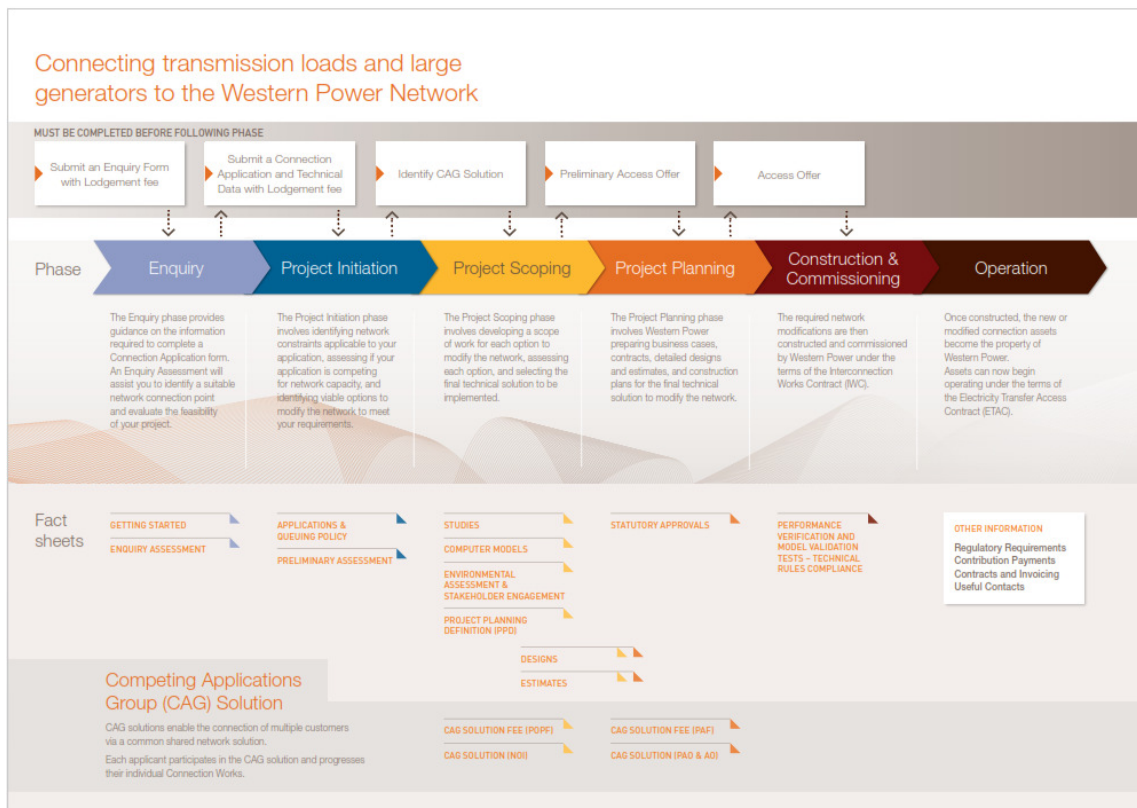


Figure 2 Overview of the Western Power connection process

3.2.2.3 Competing Applications Group Solutions

If Western Power considers that a shared network solution will meet some or all of the requirements of a CAG (for example by resolving a network constraint and thereby enabling the connection of multiple customers), then Western Power will develop this shared network solution and offer it to all customers in the CAG whose applications are ready and able to proceed to an access offer.

The benefits of CAG solutions to customers include:

- Multiple customers sharing the shared network solution development cost
- Project viability is supported by the committed revenue of multiple customers
- At explicit decision points in the CAG solution process customers are able to determine whether they wish to continue progressing through the process, and demonstrate commitment by making financial contributions to the solution development.

3.2.2.4 Applicant-Specific Solutions

An applicant may request that Western Power develop an applicant-specific solution, either at the time of application, or at any time after application. If a customer requesting an applicant-specific solution does not wish to optout of a CAG and if a CAG solution is identified and progressed, then the applicant will be asked to submit a second application that will will used for the applicant specific

solution offer leaving their original application to be included in the CAG solution development process.

The Access offer of an applicant-specific solution to a customer will be subject to an objections process. Existing network users and customers competing for the same network capacity may object on the grounds that the applicant specific solution would impede Western Power's ability to provide the covered services to these other parties compared with what the position would be if the applicant-specific solution were not implemented.

3.2.2.5 Non-competing / Unconstrained Applications

The process followed for customers whose applications are not competing with others for network capacity, or who are not impeded by any network constraints, is similar to that used for an applicant-specific solution. However, there is one important difference – there is no objections process.

3.2.2.6 Withdrawn Connection Applications

At any time an applicant may request to withdraw their connection application and any associated electricity transfer application.

In addition, in some circumstances a connection application may be deemed to be withdrawn (for example, if the applicant has not provided Western Power with the correct information or data within the specified timeframe, or if they have not responded to Western Power within certain timeframes at explicit decision points in the CAG solution process).

If a connection application is withdrawn and the applicant wishes to continue to pursue connection to the Western Power Network, they will have to recommence the connection process by submitting a new connection application.

4. Proposed AQP Revisions

Western Power has identified 20 potential refinements to the AQP. The following three tables summarise the 20 proposed revisions grouping them by the part of the AQP to which they apply and the significance of the proposed revision – suggested as ‘material’, ‘minor’ or ‘administrative’ in nature.

Table 1 Proposed revisions to connection application provisions

| ID | AQP clause | Summary of Issue | Proposed resolution |
|------------------------------------|------------|---|--|
| Connection applications - material | | | |
| 1 | 24.2 | <p>The AQP only supports capacity to be provided to CAG members where that capacity has been developed by shared works (in response to the connection applications).</p> <p>Occasionally, spare capacity becomes available without any customer funded shared works e.g. through growth driven network augmentation or through a reduction in existing contracted load/generation capacity. As the formation of a CAG relies on the identification of shared works, the CAG mechanism cannot be used to release this capacity to CAG members.</p> | Amend Clause 24.2 so that in a situation where spare capacity ‘becomes available’ the available capacity can be offered to applicants on a first come first served (priority date) basis. |
| 2 | NEW | <p>Applicants can remain in the process indefinitely although being dormant, in some cases having had no contact with Western Power for many years.</p> <p>This impacts on the Priority Date mechanism and hence release of capacity to applicants ready willing and able but that have a later Priority Date.</p> | <p>Clause to be developed that sets out provisions and criteria (conditions) that deems an application as dormant and hence may be withdrawn.</p> <p>Potentially insert a clause based on that previously included in the AA2 AQP.</p> |

| ID | AQP clause | Summary of Issue | Proposed resolution |
|--|------------|---|---|
| | | It also impacts the objections process as Western Power is obliged to provide all competing applicants with an opportunity to object to an applicant specific solution. | |
| Connection applications - minor | | | |
| 3 | 24.6 | It is not feasible to include all studies, design work, approvals and other processing work required to provide an access offer within 30 business days of reviewing responses to Preliminary Access Offers (PAO). | Remove a time bound reference - include wording that states an intent to process as quickly as is reasonable and prudent. |
| 4 | NEW | <p>In responding to a notice of intention to prepare a preliminary access offer (NOI) or a PAO, there is no option for a connection applicant in a CAG to elect to opt out of the CAG process (maintaining their priority date) with the intention of progressing in a new CAG solution when it is formed.</p> <p>If they do not wish to accept the NOI / PAO the available options are only to progress as an applicant specific solution or withdraw the application.</p> | Allow opt out mechanisms at the NOI and PAO stages that enables the connection application to retain its priority date, similar to the option they have at other times under 24.1 (b2). |
| 5 | NEW | <p>AQP does not identify any mechanism for funding studies required to prepare a NOI.</p> <p>These may be required to provide a reasonable level of information to CAG applicants so that they can make an informed decision about accepting an NOI and funding the subsequent solution development.</p> | Amend AQP to include clauses setting out the mechanism for obtaining funding for undertaking studies prior to issuing a NOI. |
| Connection applications - administrative | | | |

| ID | AQP clause | Summary of Issue | Proposed resolution |
|----|----------------------|--|--|
| 6 | 24.8 and Definitions | Clause 24.8 appears to prevent Western Power including forecast natural load growth and future connections when determining spare capacity. | Add to 24.8 and amend the defined term “spare capacity” to consider forecast natural load growth |
| 7 | 24A.2 | The current provision regarding a tender process is incompatible with the CAG access regime. | <p>Remove the clause in its entirety to avoid giving preference to applicants that are successful in a tender process.</p> <p>Leave the resolution to the parties developing the terms of the tender. Such that the AQP is agnostic to the purpose behind the application.</p> |
| 8 | 20.3b and 16.5 | <p>Western Power is obliged to provide competing applicants that were ‘within the same competing applications group’ an opportunity to object to an applicant specific solution.</p> <p>Under Clause 16.5 however, an applicant may, at the time of making a connection application, elect that the connection application is to be processed as an applicant-specific solution and is not to be considered as part of a competing applications group.</p> <p>This causes a technical problem where the applicant specific solution may cause an impediment to Western Power providing the covered service sought by some CAG applicants, however as the applicant specific solution application was never included in the CAG they would not be provided the opportunity to object.</p> <p>The change proposed is to provide the right to object to those that should have the right to object.</p> | Amend clause 20.3b to enable all competing applicants the right to object to an applicant seeking an applicant specific solution. |

| ID | AQP clause | Summary of Issue | Proposed resolution |
|----|---------------|--|---|
| 9 | 18.1 | <p>The current wording sets up a potential expectation from the customer that the preliminary assessment may not be required - when in practice, it is always required.</p> <p>The preliminary assessment typically provides an assessment of network connection options, and indicative costs and timeframes.</p> | Amend clause to make a preliminary assessment mandatory, unless agreed by Western Power. |
| 10 | 24.5 | Clause 24.5 details mechanisms for acceptance and rejection but is silent on action/treatment if an applicant doesn't respond within stated timeframes to a preliminary access offer. | Additional sub-clause to state that the application will be deemed withdrawn if no response is received within stated timeframes. |
| 11 | NEW | Whilst members of a CAG may have their CAG contract terminated, there is no mechanism to terminate / disband the CAG itself. | When there is no potential to provide access offers to members of a CAG, Western Power can disband the CAG. |
| 12 | 24.6C | Title not correct - amend to 'Exceeding Maximum Levels' to reflect clause | Amend title as proposed |
| 13 | 24.2 and 24.4 | Drafting error - inconsistent wording between two clauses that should be common | Standardised wording of clauses 24.2 and 24.4. |

Table 2 Proposed revisions to transfer application provisions

| ID | AQP clause | Summary of Issue | Proposed resolution |
|--|------------|--|---|
| Transfer applications - material | | | |
| 14 | 13 | The Contestability Assessment is somewhat ambiguous in the AQP - as to whether the assessment is connection point by connection point or assessed on the basis of an end customers portfolio of connection points. | The basis on which exit points are assessed as being contestable is to be aligned with the Electricity Corporations (Prescribed Customer) Order 2007. |
| Transfer applications - minor | | | |
| 15 | NEW | There is a misconception that the AQP enables capacity currently contracted to one user being temporarily made available to another user. This is not the purpose of the AQP and the AQP has no mechanism to achieve this. Capacity transfers and relocations are dealt with under the Transfer and Relocations Policy. | Address ambiguity in AQP that is the cause of this misconception by making it clear that the AQP does not allow the transfer of unused capacity to another user – refer to the Transfer and Relocations Policy. |
| Transfer applications - administrative | | | |
| 16 | 14.4 | The current wording is ambiguous as to whether consent is required from the existing ETAC holder for the splitting of a connection point - in practice the existing ETAC holder must consent. | Drafting should clarify that consent is required from the existing retailer. |
| 17 | 9.1 (c) | Under AQP there is a potential for a mismatch between the covered service and the ability of the connection point to provide that covered service. A transfer application may expose these mismatches. This issue arose with a customer on a HV connection | Clause to be amended such that Western Power is not obliged to offer the same service through a transfer arrangement as was previously offered if the connection point is not eligible to provide that service. |

| ID | AQP clause | Summary of Issue | Proposed resolution |
|----|------------|--|---------------------|
| | | being on a LV tariff and that tariff service not being able to be transferred during a change in retailer. | |

Table 3 Proposed revisions to common provisions

| ID | AQP clause | Summary of Issue | Proposed resolution |
|------------------------------------|---------------------------------------|--|---|
| Common provisions - material | | | |
| 18 | NEW | <p>AQP does not specifically state that it is only applicable to applications for covered services.</p> <p>This may create confusion regarding any relevance for property developers not seeking a covered service.</p> <p>The AQP Part C deals with 'Where there are competing applications' and the 'Applicant-specific solution option' but does not refer to connection applications that are 'not competing'.</p> | <p>Clarify in Part A that:</p> <ul style="list-style-type: none"> the AQP applies to any application for covered services does not apply to property developers, as they are not seeking a covered service where an application is not competing then a simple process applies |
| Common provisions - administrative | | | |
| 19 | Clause 2.1 Definitions: definition of | Client's consider project specific information to be confidential as a matter of course. AQP's definition of confidential information requires that the client <u>specifies</u> which of the information it provides is confidential. | <p>Clause 2.1 'Definitions' to be amended such that the following information is not confidential and hence may be provided to third parties without seeking consent:</p> <p>Zone substation (if applicable)</p> |

| ID | AQP clause | Summary of Issue | Proposed resolution |
|----|----------------------------|---|---|
| | "confidential information" | From time to time Western Power has been requested to disclose certain project information to third parties. Western Power proposes to make it clearer as to which project information is not confidential. | Generation type Capacity sought Region Priority date |
| 20 | 7.4 | Clause 7.4 of the AQP currently only allows transfer applicants (and not connection applicants) to mutually agree to depart from the AQP (subject to no impediment to other applicants) | Clarify that clause 7.4 applies to connection applicants as well as transfer applicants |

5. AQP stakeholder engagement

The AQP stakeholder engagement process aims to:

- explain the proposed AQP changes including the issues being addressed by each of the AQP revisions;
- provide stakeholders with an opportunity to understand the issues and the implications of the proposed changes; and
- capture feedback on the proposed revisions to the AQP.

Through the process Western Power is keen to:

- validate that the proposed changes address key issues for stakeholders with the existing AQP;
- identify any other opportunities for improvement; and
- ensure stakeholders are well informed of the proposed changes.

Western Power has retained GHD to assist with the AQP consultation.

A website (www.aqpreview.net) has been established to allow stakeholders to be part of the AQP engagement process. By accessing the website stakeholders can:

- obtain copies of this briefing paper
- register to participate in consultation activities; and
- provide feedback on the proposed revisions and other area of the AQP.

The feedback gathered during the consultation process will be used in developing the revised AQP that will be submitted to the ERA with the AA4 proposal. In keeping with the AA4 submission timeframe, stakeholder feedback on the AQP should be provided by Friday 19th May 2017.



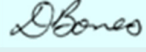
6. Glossary of Terms

| Term | Definition |
|---|--|
| Access Code | Electricity Networks Access Code 2004 |
| Access Arrangement | An arrangement for access to a network covered by the Access Code, such as the Western Power network, that has been approved by the ERA |
| CAG | Competing Applications Group |
| connection applications | An application lodged with Western Power that has the potential to require a modification to the network, including an application to: <ul style="list-style-type: none"> a) connect facilities and equipment at a new <i>connection point</i>; or b) increase consumption or generation at an existing <i>connection point</i>; or c) materially modify <i>facilities and equipment</i> connected at an existing <i>connection point</i>; or d) augment the network for any other reason, {Note: this might be, for example, to service a subdivision.} |
| covered service | A service provided by a network covered by the Access Code. Covered services subdivide into reference and non-reference services |
| Electricity Transfer Application | An application lodged with Western Power seeking to obtain or modify an <i>entry, exit or bidirectional service</i> . |
| Electricity Transfer Access Contract (ETAC) | The agreement formed between Western Power and connecting parties allowing access to the network. |
| Economic Regulating Authority (ERA) | The regulating authority defined in the Access Code. The ERA reviews the Access Arrangement proposed by Western Power and has the power to require changes to an Access Arrangement to ensure alignment with the objectives specified in the Access Code. |
| reference service | These services comply with the Technical Rules and meet the service standard benchmarks set out in Western Power's approved Access Arrangement. They generally correspond to providing unconstrained access. |
| non-reference service | These services do not meet the requirements of the Technical Rules and typically involve an operational solution, such as a curtailable load scheme or a generation run back scheme. These imply a level of constrained access to the network. |
| NOI | Notice of intention to prepare a preliminary access offer |

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| Revision No. | Author | Reviewer | Date | Approved for Issue | Date |
|--------------|---------|--------------|-----------|---|-----------|
| 1 | D.Bones | S Hinchliffe | 23/4/2017 |  | 23/4/2017 |
| 1.1 | D.Bones | S Hinchliffe | 28/4/2017 |  | 28/4/2017 |
| 1.2 | D.Bones | S Hinchliffe | 1/5/2017 |  | 1/5/2017 |

Appendix B Online Questionnaire

AQP Review Feedback Form

Thank you for participating in the Western Power's Applications and Queuing Policy Review.

As part of this review we are seeking your feedback on the proposed updates to the Policy and any other areas of improvement or change. This feedback form is arranged into the four following sections

- Connection Applications**
- Transfer Applications**
- Common issues**
- Other areas of improvement or areas that should be addressed by the AQP**

It is advisable that you read the AQP Review Briefing Paper before you provide your written feedback. The Briefing Paper can be downloaded [here](#).

Connection Applications - Clause 24.2

1. Do you agree that this is an issue with Clause 24.2?

Description of Issue

The AQP only allows capacity to be provided to CAG members where that capacity has been developed by shared works. Occasionally, spare capacity becomes available without any shared works e.g. through growth driven network augmentation or through contracted reduction in load/generation. As the formation of a CAG relies on the identification of shared works, the CAG mechanism cannot be used to release this capacity to CAG members.

Proposed Resolution

Amend Clause 24.2 to enable all available capacity to be offered to CAG members.

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

Connection Applications - Clause 24.2

2. If you answered "Yes", do you agree with the resolution "Amend Clause 24.2 to enable all available capacity to be offered to CAG members".

☐ Yes

☐ No

If you answered "Yes" please provide any further feedback you may have.

Connection Applications - Clause 24.2

3. If you answered "No" to the proposed resolution "Amend Clause 24.2 to enable all available capacity to be offered to CAG members", what do you propose as a possible resolution?

Connection Applications - Proposed new Clause #1

4. Proposed new Clause #1 in response to the following issue. Do you agree that this is an issue with the AQP?

Description of Issue

Applicants can remain in the process indefinitely although

being dormant. This impacts on the priority date mechanism and hence release of capacity to applicants ready willing and able but that have a later Priority Date; also impacts objections process

Proposed Resolution

Clause to be developed that sets out provisions and criteria (conditions) that permit Western Power to deem that an applicant is dormant and hence whose application may be terminated. Reinsert clause in AA2 AQP.

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

Connection Applications - Proposed new Clause #1

5. If you answered "Yes", do you agree with the resolution "Clause to be developed that sets out provisions and criteria (conditions) that permit Western Power to deem that an applicant is dormant and hence whose application may be terminated. Reinsert clause in AA2 AQP."

☐ Yes

☐ No

If "Yes" please provide any other feedback

Connection Applications - Proposed new Clause #1

6. If you answered "No" to the proposed resolution "Clause to be developed that sets out provisions and criteria (conditions) that permit Western Power to deem that an applicant is dormant and hence whose application may be terminated. Reinsert clause in AA2 AQP." what do you propose as a possible resolution?

Connection Applications - Clause 24.6

7. Do you agree that this is an issue with Clause 24.6?

Description of Issue

It is not feasible to include all studies and works required in the detailed planning phase in order to provide an access offer within the stated endeavoured 30 day response time.

Proposed Resolution

Remove a time bound reference - include wording that states an intent to process as quickly as is reasonable and prudent.

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

Connection Applications - Clause 24.6

8. If you answered "Yes", do you agree with the resolution "Remove a time bound reference - include wording that states an intent to process as quickly as is reasonable and prudent."

☐ Yes

☐ No

If "Yes" please provide any other feedback

Connection Applications - Clause 24.6

9. If you answered "No" to the proposed resolution "Remove a time bound reference - include wording that states an intent to process as quickly as is reasonable and prudent.", what do you propose as a possible resolution?

Connection Application - Proposed new Clause #2

10. Proposed new Clause #2 in response to the following issue. Do you agree that this is an issue with the AQP?

Description of Issue

There is no mechanism for a connection applicant in a CAG to elect to opt out of the process and maintain their priority date whilst deferring until a new CAG is formed with respect to connections behind a given constraint.

Proposed Resolution

Allow opt out mechanisms at appropriate stages of the connection application process that enables the connection application applicant to retain its priority date for connection behind a given constraint.

This is not just with respect to applicants that have been offered a PAO.

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

Connection Application - Proposed new Clause #2

11. If you answered "Yes", do you agree with the resolution "Allow opt out mechanisms at appropriate stages of the connection application process that enables the connection application applicant to retain its priority date for connection behind a given constraint. This is not just with respect to applicants that have been offered a PAO."

☐ Yes

☐ No

If "Yes" please provide any other feedback

Connection Application - Proposed new Clause #2

12. If you answered "No" to the proposed resolution "Allow opt out mechanisms at appropriate stages of the connection application process that enables the connection application applicant to retain its priority date for connection behind a given constraint. This is not just with respect to applicants that have been offered a PAO", what do you propose as a possible resolution?

AQP Review - Clause 24.8 and Definitions

13. Do you agree that this is an issue with Clause 24.8 and definitions?

Description of Issue

Clause 24.8 appears to prevent Western Power including forecast load growth and future connections when determining spare capacity.

Proposed Resolution

Add to 24.8 and amend the defined term "spare capacity" to consider forecast load growth.

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

AQP Review - Clause 24.8 and Definitions

14. If you answered "Yes", do you agree with the resolution "Add to 24.8 and amend the defined term "spare capacity" to consider forecast load growth".

☐ Yes

☐ No

If you answered "Yes" to Q2 please provide any further feedback you may have.

15. If you answered "No" to the proposed resolution "Add to 24.8 and amend the defined term "spare capacity" to consider forecast load growth", what do you propose as a possible resolution?

Connection Application - Proposed new Clause #3

16. Proposed new Clause #3 in response to the following issue. Do you agree that this is an issue with the AQP?

Description of Issue

AQP does not capture Pre NOI process including any mechanism for funding required studies leading to issue of a draft NOI. NOI refers to notice of intention to prepare a preliminary access offer.

Proposed Resolution

Amend AQP to align with the Western Power "Complex Customer Funded Connection Process" and to include clauses setting out the mechanism for obtaining funding for undertaking studies prior to issuing a draft NOI.

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

Connection Application - Proposed new Clause #3

17. If you answered "Yes", do you agree with the resolution "Amend AQP to align with the Western Power "Complex Customer Funded Connection Process" and to include clauses setting out the mechanism for obtaining funding for undertaking studies prior to issuing a draft NOI."

☐ Yes

☐ No

If "Yes" please provide any other feedback

Connection Application - Proposed new Clause #3

18. If you answered "No" to the proposed resolution "Amend AQP to align with the Western Power "Complex Customer Funded Connection Process" and to include clauses setting out the mechanism for obtaining funding for undertaking studies prior to issuing a draft NOI", what do you propose as a possible resolution?

Connection Application - Clause 24A.2

19. Do you agree that the following is an issue with Clause 24A.2?

Description of Issue

The current provision regarding a tender process is incompatible with the CAG access regime.

Proposed Resolution

Remove the clause in its entirety to avoid giving preference to applicants that are successful in a tender process. Leave the resolution to the parties developing the terms of the tender. Such that the AQP is agnostic to the purpose behind the application.

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

Connection Applications - Clause 24A.2

20. If you answered "Yes", do you agree with the resolution "Remove the clause in its entirety to avoid giving preference to applicants that are successful in a tender process. Leave the resolution to the parties developing the terms of the tender. Such that the AQP is agnostic to the purpose behind the application.".

☐ Yes

☐ No

If you answered "Yes" to Q2 please provide any further feedback you may have.

Connection Applications - Clause 24A.2

21. If you answered "No" to the proposed resolution "Remove the clause in its entirety to avoid giving preference to applicants that are successful in a tender process. Leave the resolution to the parties developing the terms of the tender. Such that the AQP is agnostic to the purpose behind the application", what do you propose as a possible resolution?

Connection Application - Clause 20.3b and 16.5

22. Do you agree that the following is an issue with Clause 20.3b and 16.5?

Description of Issue

Members of a CAG seeking an access offer may not object to an applicant applying for an applicant specific solution and opting out of a CAG under Clause 16.5. This causes a problem where the applicant specific solution may cause an impediment to Western Power providing the covered service sought by those CAG members.

The change proposed is to provide the right to object to those that should have the right to object.

Proposed Resolution

Amend clause 20.3b to enable all competing applicants the right to object to an applicant seeking an applicant specific solution.

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

Connection Applications - Clause 20.3b and 16.5

23. If you answered "Yes", do you agree with the resolution "Amend clause 20.3b to enable all competing applicants the right to object to an applicant seeking an applicant specific solution".

☐ Yes

☐ No

If you answered "Yes" to Q2 please provide any further feedback you may have.

24. If you answered "No" to the proposed resolution "Amend clause 20.3b to enable all competing applicants the right to object to an applicant seeking an applicant specific solution", what do you propose as a possible resolution?

Connection Application - Clause 18.1

25. Do you agree that the following is an issue with Clause 18.1?

Description of Issue

The current wording sets up a potential expectation from the customer that the preliminary assessment may not be required - when in practice, it is always required..

Proposed Resolution

Amend clause to make a preliminary assessment mandatory.

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

Connection Applications - Clause 18.1

26. If you answered "Yes", do you agree with the resolution "The current wording sets up a potential expectation from the customer that the preliminary assessment may not be required - when in practice, it is always required. ".

☐ Yes

☐ No

If you answered "Yes" to Q2 please provide any further feedback you may have.

Connection Applications - Clause 18.1

27. If you answered "No" to the proposed resolution "The current wording sets up a potential expectation from the customer that the preliminary assessment may not be required - when in practice, it is always required", what do you propose as a possible resolution?

Connection Application - Clause 24.5

28. Do you agree that the following is an issue with Clause 24.5?

Description of Issue

Clause 24.5 details mechanisms for acceptance and rejection but is silent on action/treatment if an applicant doesn't respond within stated time frames to a preliminary access offer..

Proposed Resolution

Additional sub-clause to state that the application will be deemed withdrawn if no response is received within stated time frames.

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

Connection Applications - Clause 24.5

29. If you answered "Yes", do you agree with the resolution "Additional sub-clause to state that the application will be deemed withdrawn if no response is received within stated time frames. ".

☐ Yes

☐ No

If you answered "Yes" to Q2 please provide any further feedback you may have.

Connection Applications - Clause 24.5

30. If you answered "No" to the proposed resolution "Additional sub-clause to state that the application will be deemed withdrawn if no response is received within stated time frames.", what do you propose as a possible resolution?

Connection Applications - Proposed new Clause #4

31. Proposed new Clause #4 in response to the following issue. Do you agree that this is an issue with the AQP?

Description of Issue

Whilst members of a CAG may have their membership to a CAG terminated, there is no mechanism to disband the CAG itself.

Proposed Resolution

When there is no potential to provide connection offers to members of a CAG , Western Power can disband the CAG and cancel the application process for the CAG members..

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

Connection Applications - Proposed new Clause #4

32. If you answered "Yes", do you agree with the resolution "When there is no potential to provide connection offers to members of a CAG , Western Power can disband the CAG and cancel the application process for the CAG members.."

☐ Yes

☐ No

If "Yes" please provide any other feedback

Connection Applications - Proposed new Clause #4

33. If you answered "No" to the proposed resolution "When there is no potential to provide connection offers to members of a CAG , Western Power can disband the CAG and cancel the application process for the CAG members" what do you propose as a possible resolution?

34. Do you agree that the following is an issue with Clause 24.6c?

Description of Issue

Title not correct - amend to 'Exceeding Maximum Levels' to reflect clause

Proposed Resolution

Amend title as proposed

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

Connection Applications - Clause 24.6c

35. If you answered "Yes", do you agree with the resolution "Amend title as proposed".

☐ Yes

☐ No

If you answered "Yes" to Q2 please provide any further feedback you may have.

36. If you answered "No" to the proposed resolution "Amend title as proposed", what do you propose as a possible resolution?

Connection Application - Clause 24.2 and 24.4

37. Do you agree that the following is an issue with Clause 24.2 and 24.4?

Description of Issue

Drafting error - inconsistent wording between two clauses that should be common

Proposed Resolution

Standardised wording of clauses 24.2 and 24.4.

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

Connection Applications - Clause 24.2 and 24.4

38. If you answered "Yes", do you agree with the resolution "Standardised wording of clauses 24.2 and 24.4".

☐ Yes

☐ No

If you answered "Yes" to Q2 please provide any further feedback you may have.

Connection Applications - Clause 24.2 and 24.4

39. If you answered "No" to the proposed resolution "Standardised wording of clauses 24.2 and 24.4", what do you propose as a possible resolution?

40. Do you agree that this is an issue with Clause 13?

Description of Issue

The Contestability Assessment is somewhat ambiguous in the AQP - as to whether the assessment is connection point by connection point or assessed on the basis of an end customers portfolio of connection points

Proposed Resolution

The basis on which exit points are assessed as being contestable should be aligned with the definition of prescribed customer in the Electricity corporations (Prescribed Customer) Order 2007.

This can be achieved by moving the contestability assessment from the AQP to the Customer Transfer Code.

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

Transfer Applications - Clause 13

41. If you answered "Yes", do you agree with the resolution "The basis on which exit points are assessed as being contestable should be aligned with the definition of prescribed customer in the Electricity corporations (Prescribed Customer) Order 2007. This can be achieved by moving the contestability assessment from the AQP to the Customer Transfer Code".

☐ Yes

☐ No

If you answered "Yes" to Q2 please provide any further feedback you may have.

42. If you answered "No" to the proposed resolution "The basis on which exit points are assessed as being contestable should be aligned with the definition of prescribed customer in the Electricity corporations (Prescribed Customer) Order 2007. This can be achieved by moving the contestability assessment from the AQP to the Customer Transfer Code", what do you propose as a possible resolution?

Transfer Applications - Proposed new Clause #5

43. Proposed new Clause #5 in response to the following issue. Do you agree that this is an issue with the AQP?

Description of Issue

There is a misconception that the AQP enables capacity currently contracted to one user being temporarily made available to another user. This is not the purpose of the AQP and the AQP has no mechanism to achieve this.

Proposed Resolution

Address ambiguity in AQP that is the cause of this misconception by making it clear that the AQP does not allow the transfer of unused capacity to another user.

Or, include provision within AQP to enable a capacity sharing arrangement under which capacity would be contracted to both parties who would undertake not to exceed a combined usage for a temporary period.

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

Transfer Application - Proposed new Clause #5

44. If you answered "Yes", do you agree with the resolution "Address ambiguity in AQP that is the cause of this misconception by making it clear that the AQP does not allow the transfer of unused capacity to another user. Or, include provision within AQP to enable a capacity sharing arrangement under which capacity would be contracted to both parties who would undertake not to exceed a combined usage for a temporary period"

☐ Yes

☐ No

If "Yes" please provide any other feedback

Transfer Applications - Proposed new Clause #5

45. If you answered "No" to the proposed resolution "Address ambiguity in AQP that is the cause of this misconception by making it clear that the AQP does not allow the transfer of unused capacity to another user. Or, include provision within AQP to enable a capacity sharing arrangement under which capacity would be contracted to both parties who would undertake not to exceed a combined usage for a temporary period", what do you propose as a possible resolution?

Transfer Applications - Clause 14.4

46. Do you agree that this is an issue with Clause 14.4?

Description of Issue

The current wording is ambiguous as to whether consent is required for the splitting of a connection point from the existing ETAC holder - where in practice the existing ETAC holder must consent

Proposed Resolution

Drafting should clarify that consent is required from the existing retailer.

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

Transfer Applications - Clause 14.4

47. If you answered "Yes", do you agree with the resolution "Drafting should clarify that consent is required from the existing retailer".

☐ Yes

☐ No

If you answered "Yes" to Q2 please provide any further feedback you may have.

Transfer Applications - Clause 14.4

48. If you answered "No" to the proposed resolution "Drafting should clarify that consent is required from the existing retailer", what do you propose as a possible resolution?

49. Do you agree that this is an issue with Clause 9.1c?

Description of Issue

Under AQP there is a potential for a mismatch between the covered service and the ability of the connection point to provide that covered service which would otherwise be required under a transfer process such as from one retailer to another. This issue arose with a customer on and HV connection being on an LV tariff and that tariff service not being able to be transferred during a change in retailer.

Proposed Resolution

Clause to be amended such that Western Power is not obliged to offer the same service during a transfer arrangement as was previously offered if the connection point is not eligible to provide that service.

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

Transfer Applications - Clause 9.1c

50. If you answered "Yes", do you agree with the resolution "Clause to be amended such that Western Power is not obliged to offer the same service during a transfer arrangement as was previously offered if the connection point is not eligible to provide that service.".

☐ Yes

☐ No

If you answered "Yes" to Q2 please provide any further feedback you may have.

Transfer Applications - Clause 9.1c

51. If you answered "No" to the proposed resolution Clause to be amended such that Western Power is not obliged to offer the same service during a transfer arrangement as was previously offered if the connection point is not eligible to provide that service", what do you propose as a possible resolution?

Other - Proposed new clause #6

52. Proposed new Clause #6 in response to the following issue. Do you agree that this is an issue with the AQP?

Description of Issue

AQP does not specifically state that it is only applicable to applications for covered services.

Proposed Resolution

Clarify in Part A that the AQP applies to any application for covered services, however where an application is not competing then a simple process applies
Clarify in Part A that the AQP does not apply to property developers, as they are not seeking a covered service

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

Other - Proposed new Clause #6

53. If you answered "Yes", do you agree with the resolution "Clarify in Part A that the AQP applies to any application for covered services, however where an application is not competing then a simple process applies. Clarify in Part A that the AQP does not apply to property developers, as they are not seeking a covered service".

☐ Yes

☐ No

If "Yes" please provide any other feedback

Other - Proposed new Clause #6

54. If you answered "No" to the proposed resolution #1 "Clarify in Part A that the AQP applies to any application for covered services, however where an application is not competing then a simple process applies. Clarify in Part A that the AQP does not apply to property developers, as they are not seeking a covered service", what do you propose as a possible resolution?

55. Do you agree that this is an issue with Clause 2.1?

Description of Issue

Clients consider project specific information to be confidential as a matter of course. AQP's definition of confidential information requires that the client specifies which of the information it provides is confidential. From time to time Western Power has been requested to disclose certain project information to third parties. Western Power would like to have clarity as to which project information is not deemed confidential.

Proposed Resolution

Clause 2.1 'Definitions' to be amended such that the following information is deemed not confidential and hence may be provided to third parties without seeking consent:

- Zone substation (if applicable)
- Generation type
- Capacity sought
- Region
- Priority date

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

Other - Clause 2.1

56. If you answered "Yes", do you agree with the resolution Clause 2.1 'Definitions' to be amended such that the following information is deemed not confidential and hence may be provided to third parties without seeking consent:

- Zone substation (if applicable)
- Generation type
- Capacity sought
- Region
- Priority date."

☐ Yes

☐ No

If you answered "Yes" to Q2 please provide any further feedback you may have.

Other - Clause 2.1

57. If you answered "No" to the proposed resolution "Clause 2.1 'Definitions' to be amended such that the following information is deemed not confidential and hence may be provided to third parties without seeking consent:

- Zone substation (if applicable)
- Generation type
- Capacity sought
- Region
- Priority date.", what do you propose as a possible resolution?

Other - Clause 7.4

58. Do you agree that this is an issue with Clause 7.4?

Description of Issue

Clause 7.4 of the AQP currently only allows transfer applicants (and not connection applicants) to mutually agree to depart from the AQP (subject to no impediment to other applicants)

Proposed Resolution

Clarify that clause 7.4 applies to connection applicants as well as transfer applicants.

☐ Yes

☐ No

If you answered "No" what do you believe the issue and resolution to be?

Other - Clause 7.4

59. If you answered "Yes", do you agree with the resolution "Clarify that clause 7.4 applies to connection applicants as well as transfer applicants".

☐ Yes

☐ No

If "Yes" please provide any other feedback

Other - Clause 7.4

60. If you answered "No" to the proposed resolution "Clarify that clause 7.4 applies to connection applicants as well as transfer applicants", what do you propose as a possible resolution?

Other areas of improvement or areas that should be addressed by the AQP

61. Please provide feedback on any issues or areas of improvement in the AQP that you believe should be addressed.

Issue 1

Issue 2

Issue 3

Issue 4

issue 5

issue 6

issue 7

issue 8

Issue 9

Issue 10

Appendix C Lacour Energy Feedback

| | | | |
|-----------------|--|-------------|---------------|
| Project | WP AQP Consultation | From | David Bones |
| Subject | Meeting with Mark Rayner (Lacour Energy) (mark@lacour.com.au) | Tel | (08)9321 6632 |
| Venue/Date/Time | 999 Hay Street, 4/5/2017, 3:30pm | Project No. | 9110305 |
| Attendees | David Bones, Mark Rayner | Apologies | none |

Purpose

Provide an opportunity to clarify concerns Mark expressed at the AQP forum held on 3/5/2017 regarding the operation of the AQP and changes proposed for the AA4 period.

Matters Discussed

Mark's key concern relates to the use of the priority date and the role it plays within the AQP to constrain the order in which available capacity is offered to connection applicants. The primary concern is in regards to generators seeking connection and the impact that the priority date might create in the following scenarios:

- Generators are seeking connection on a constrained basis utilising the Generator Interim Access (GIA) tool;
- Network capacity becomes available for connection applicants as a result of Synergy deciding to shut down 4 power stations¹
- Generation connection in the SWIS migrates to a NEM-like process

Mark has a general concern that the priority date concept allows the connections process to be manipulated by applicants with earlier connection dates to the detriment of applicants with later priority dates thereby impeding generators that are more ready and able to progress their application from doing so.

Scenarios of Concern

Impeded connection under the GIA

The process that will apply to generators seeking constrained access is uncertain, it is unclear whether the AQP will have any influence on that process. Mark believes that the priority date should not apply in this circumstance. A NEM style process should be adopted for processing connection applications. This should include an appropriately sized application fee that recovers the costs of developing the connection offer and deters applicants that are not ready to proceed with their connection. Currently NEM NSPs charge an application fees that significantly exceed those that SWIS connection applicants must pay to be allocated a priority date.

Impeded access to released capacity

The suggested revision to clause 24.2 to make spare capacity available to connection applicants is proposed to apply to capacity released through the closure of Synergy power stations. The proposed change would see capacity offered to connection applicants based on their priority date. The comments provided by Western Power at the AQP forum suggested that this process would not impede generators with later priority dates

¹ <https://www.synergy.net.au/About-us/News-and-announcements/Media-releases/Synergy-to-Reduce-Generation-Capacity-by-380-MW>

from accessing the spare capacity on the basis that any applicants with higher priority dates who are not ready to commit to developing their connection would decline the offered capacity which would then be available to applicants with later priority dates.

Mark believes that the cost associated with progressing a connection may not be significant in this situation given the absence of any significant network augmentation to release capacity. As a result, those applicants with the earlier application dates may be able to program acceptance of capacity offers and impede other generators with later priority dates who are more ready to proceed to a connection.

It is recommended that alternatives to relying on the priority date be adopted as the basis for allocating spare capacity to connection applicants. Alternatives might include:

- Allocating capacity to only those that are ready to progress as demonstrated by the payment of a substantive application fee;
- Using an auction process to allocate spare capacity.

Transition to NEM-like generator access arrangement

The WA Market Review was moving towards adopting a NEM-like constrained access arrangement for generators for the SWIS. While the market review has stalled with the change of government it is likely that some aspect of the review will proceed across the AA4 period. Mark expects that the move to NEM-like constrained access is likely to proceed. It is recommended that the AA4 AQP be constructed such that it does not prevent the adoption of a NEM-like constrained access regime.

This note confirms and records GHD's interpretation of the discussions which occurred and our understanding reached during this meeting. Unless notified in writing within 7 days of the date issued, we will assume that this recorded interpretation or description is complete and accurate.

Appendix D Perth Energy Submission

Background

On 2 May 2017 Western Power published a briefing paper, prepared by GHD, on proposed changes to the Applications and Queuing Policy to be incorporated within Access Arrangement 4 (AA4). A public presentation was subsequently held on 3 May.

Perth Energy notes that there was a general expectation that regulation of Western Power would soon move to the Australian Energy Regulator and that this process was stopped by failure of the requisite legislation to pass through Parliament. As such Western Power is required to continue compliance with the current Access Code.

Perth Energy has recent experience with the applications process through proposals to build additional power generation facilities in the Kwinana region. We appreciate the opportunity to make comment on Western Power's proposed changes and would be happy to discuss these in person with Western Power staff if that is desired. Our comments are set out below.

Proposed "material" changes to the AQP provisions

Perth Energy supports the proposed change to clause 24.2 by which spare capacity that comes available can be offered to applicants on a first-come-first-served basis rather than just offered to members of a competing access group.

This ties into the second issue which is seeking to remove dormant applications. Perth Energy supports the establishment of a process through which applications can be by-passed if a reasonable examination determines that they are no longer current. This process would need to be defined carefully and should avoid removing genuine applications that have been delayed because of circumstances outside of the applicant's control.

We would also support the posting of a significant deposit, commensurate with the size of a proposed generator or customer, to discourage applications being made to block other potential users.

Proposed "minor" changes to the AQP provisions

In seeking to change clause 24.6 Western Power is acknowledging that it is often not possible to provide a preliminary access offer within the nominated 30 business day deadline. The clause does not place an absolute obligation on Western Power but rather requires it to **endeavor** to meet this timeframe. Perth Energy does consider, however, that including the 30 day target may give applicants an unrealistic expectation of just how long the studies for an access application may take

There does need to be a quid pro quo for such a change. As was noted by one participant at the presentation Western Power requires details of any proposed generating plant **to the extent required by the technical rules** (clause 3.7). To fully comply with this obligation a generator applicant would need to provide full details of the specific generator that it intends to install implying that the applicant must have completed its tendering and plant selection process before making a connection application.

Given the prolonged time that may be taken before an access offer is made this obligation is unnecessarily burdensome. It should be sufficient for an applicant to identify the general characteristics of the plant – eg an industrial type gas turbine of around 40–60 MW capacity – rather than specify the precise unit. Perth Energy's experience when seeking network access for additional generation capacity at Kwinana Swift was that the various studies were scheduled to take two years. This seemed an inordinately long time given the small size of the project and that this was an expansion of an existing facility.

Clause 3.8 – Only one ETAC per connection point

Clause 3.8 states that only one electricity transfer access contract may apply to each connection point. The electricity market is changing rapidly and will continue to do so throughout the life of AA4. One potential change is that customers may seek supplies from more than one provider. A customer may take electricity from a renewable energy provider whenever this source is available but take back-up from a different provider. Smart metering would allow such an arrangement to be readily accommodated.

Perth Energy considers that this clause should either be removed now or provision be made for its removal during the term of AA4.

Generator Interim Access Arrangement

Perth Energy has very serious reservations in respect to the proposed Generation Interim Access Arrangement (GIA). We understand the drivers that are behind this and the pressure to put a mechanism in place for those applicants who had expected to be able to access the grid under the proposed change in regulation. We have several concerns with the GIA.

Our prime concern is that the GIA will only determine which of the constrained generators will actually be dispatched just before real time. This decision will be decoupled from the overall system dispatch based on the bid stack and is therefore likely to lead to non-optimum dispatch. This is in direct conflict with the market objective of minimizing the cost of electricity generation. It is also unclear how this plant dispatch mechanism can be accommodated within AEMO's dispatch process given the issues that have been raised in response to the proposal for 30 minute gate closure. If the GIA operates in near-real time the question must be asked as to how AEMO's dispatchers will be able to respond.

A second concern is that the GIA will mask existing constraints and potentially reduce opportunities to justified system upgrades. Similarly, if the process does initially work at an acceptable level there is the danger that if the urgency for a change to constrained dispatch will be reduced. The impact that the proposal will have is likely to depend heavily on the level of constraints within the system. It would be really helpful if Western Power could provide information on this so that market participants can get some idea of the scale of the issue.

Perth Energy notes, too, that participants within the GIA will not be assigned any capacity credits. This would appear to be inconsistent with the approach whereby generators with run-back schemes have been assigned full capacity credits. Assigning zero credits, along with the uncertainty of dispatch, is likely to make it very difficult for new generators to secure commercial backing for their investments.

Trading of Network Capacity

From time to time market participants may have network access that is in excess of their requirements – either temporarily or permanently. This has the potential to create “phantom” constraints where one participant cannot secure access because another participant is holding access that is not actually being used. Having, in many cases, made significant investments to secure access participants will naturally not want to surrender it to another participant.

One option that should be considered is to make network access tradable so that participants can, within the requirements of the technical rules, make commercial arrangements to facilitate access to others. This could also include allowing participants to return access to Western Power and receive financial compensation where that is appropriate. Perth Energy considers that this has the potential to better facilitate the provision of access to new generators and loads.

Appendix E Synergy Energy Feedback

Our Ref: NRM-0043
Enquiries: Simon Thackray
Telephone: (08) 6282 7622

19 May 2017

Margaret Pyrchla
Head of Regulation & Investment Management
Western Power
363 Wellington Street
PERTH WA 6000

Email aa4@westernpower.com.au

Dear Margaret

WESTERN POWER ACCESS ARRANGEMENT 4 (AA4) – GENERATOR FORUM

Thank you for the opportunity to participate in Western Power's AA4 generator forum on 3 May 2017. As requested, please find attached Synergy's response to various matters raised at the forum.

To enable Synergy to make informed decisions and regulatory submissions with respect to AA4 content affecting Synergy's generation portfolio we are seeking further information from Western Power as detailed in the attached, specifically obtaining visibility on the drafting of the proposed amendments to the applications and queuing policy.

Synergy welcomes the opportunity to meet and discuss these issues in further detail with Western Power.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "S. Thackray".

SIMON THACKRAY
MANAGER, REGULATION AND COMPLIANCE

| Category | Synergy matters of interest |
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| AQP | <p><u>GHD Item 1 – CI 24.2, Spare Capacity</u></p> <p>Synergy seeks more information on the specific drafting change to the AQP and an explanation of what the issue is in relation to WP and applicant rights. Based on the information presented our preliminary understanding is the change may not be necessary.</p> |
| AQP | <p><u>GHD Item 2 – New, Dormant Applications</u></p> <p>Synergy seeks more information on the specific drafting change to the AQP and an explanation of what the issue is in relation to WP and applicant rights. Based on the information presented our preliminary understanding is the change may not be necessary and the AQP already provides sufficient rights to WP to withdraw applications.</p> |
| AQP | <p><u>GHD Item 3 – CI24.6, Remove time bound reference</u></p> <p>Synergy seeks more information on the specific drafting change to the AQP and an explanation of what the issue is in relation to WP and applicant rights. Synergy does not support an “open ended” proposal that may potentially require an arbitration to determine what actions or omissions is “reasonable and prudent”. Synergy would also like to understand the effect of Appendix B. Based on the information presented our preliminary understanding is that the change to CI24.6 may not be necessary.</p> |
| AQP | <p><u>GHD Item 4 – New, CAG Opt Out</u></p> <p>Synergy would like more information on the specific drafting change to the AQP and an explanation of what the issue is in relation to WP and applicant rights. It appears that another bypass mechanism is being proposed. Based on the information presented our preliminary understanding is that a change may be warranted under some specific scenarios and circumstances. However, it is not clear what criteria will apply and how WP propose to give effect to this without potentially prejudicing another party’s right in respect of an existing CAG.</p> |
| AQP | <p><u>GHD Item 5 – CI24.8, Definitions, NOI Studies Funding</u></p> <p>Synergy CI24.8 deals with “Spare Capacity” and would like more information on the specific drafting change to the AQP and an explanation of what the issue is in relation to WP and applicant rights. It is not clear why WP considers the AQP does not adequately provide certainty to it in relation to the conduct and payment of studies. Further, Synergy notes WP’s position in</p> |

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| | respect to Cl17A.1 and would also like to understand how this aligns with WP's proposed change. Based on the information presented our preliminary understanding is that the proposed change may not be necessary. |
| AQP | <p><u>GHD Item 6 – Cl24.8, Definitions, Determination of Spare Capacity</u></p> <p>Synergy notes a number of amendments have been proposed in relation to Cl24.8. Synergy would like more information on the specific drafting change to the AQP and an explanation of what the issue is in relation to WP and applicant rights. It is not clear how the AQP “...appears to prevent WP” from giving regard to forecast load growth. Based on the information presented our preliminary understanding is the change may not be necessary. However, Synergy is keen to understand holistically the changes proposed in relation to “Spare Capacity”.</p> |
| AQP | <p><u>GHD Item 7 – Cl24A.2 Treatment of Applications under a Tender Process</u></p> <p>Synergy would like more information on the effect of removing Cl24A.2 in relation to WP and applicant rights and the outcomes WP is seeking to achieve in relation to future applications.</p> |
| AQP | <p><u>GHD Item 8 – Cl20.3b, 16.5 Treatment of Applications under a Tender Process</u></p> <p>Synergy would like more information on the specific drafting change to the AQP and an explanation of what the issue is in relation to WP and applicant rights. It is not clear why additional or more rights need to be provided to applicants who are not within the same competing application group. A change may be warranted to cater for some specific scenarios and circumstances. However, it is not clear what criteria will need to apply in considering an objection from any applicant is not potentially hindering the efficient processing of an applicant specific solution.</p> |
| AQP | <p><u>GHD Item 9 – Cl18.1 Mandatory Preliminary Assessments</u></p> <p>Synergy would like more information on the specific drafting change to the AQP and an explanation of what the issue is in relation to WP and applicant rights. It appears WP is proposing that preliminary assessments will be mandatory in respect of all connection applications. This proposal means, for example, a preliminary assessment will be required for a PV application</p> |


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| | under 5kW. |
| AQP | <p><u>GHD Item 10 – Cl24.5, Mandatory Preliminary Assessments</u></p> <p>Synergy would like more information on the specific drafting change to the AQP and an explanation of what the issue is in relation to WP and applicant rights. A change may be warranted to cater for some specific scenarios and circumstances. However, additional information is required on why the current provisions under cl3.10 and 15 is not sufficient to give WP certainty in relation to the contemplated issues.</p> |
| AQP | <p><u>GHD Item 11 – New, Terminating CAG Contracts</u></p> <p>Synergy would like more information on the specific drafting change to the AQP and an explanation of what the issue is in relation to WP and applicant rights. Additional information is required in relation to the contemplated scenarios or criteria where there is “no potential” for WP to provide access.</p> |
| AQP | <p><u>GHD Item 12 – Cl24.6C Drafting Error</u></p> <p>Synergy agrees the drafting error in the heading needs to be corrected.</p> |
| AQP | <p><u>GHD Item 13– Cl24.2, 24.4 Drafting Inconsistency</u></p> <p>Additional information is sought in relation to how the inconsistency affects the rights of WP and applicants.</p> |
| AQP | <p><u>GHD Item 14– Cl13, Contestability Assessments</u></p> <p>Synergy would like more information on the specific drafting change and what process changes resulting process changes plan to be implemented in AA4.</p> |
| AQP | <p><u>GHD Item 15– New, Sharing Contracted Capacity</u></p> <p>Synergy would like more information on the specific drafting change and the nature of the ambiguity under the AQP. Based on the information presented our preliminary understanding is the nature of the issue may not relate to the AQP and the</p> |

| Category | Synergy matters of interest |
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| | proposed drafting will create regulatory uncertainty. |
| AQP | <p><u>GHD Item 16 – CI14.4, Consent in relation NMI Splits/Merges</u></p> <p>Synergy would like more information on the specific drafting change to the AQP and an explanation of what the issue is in relation to WP, applicant and customer rights. Based on the information presented our preliminary understanding is the change may not be necessary. Synergy would like more information in relation to the perceived ambiguity.</p> |
| AQP | <p><u>GHD Item 17 – CI9.1(c), Compliance Issues under the Metering Code</u></p> <p>Synergy would like more information on the specific drafting change to the AQP and an explanation of what the issue is in relation to WP and applicant rights. Synergy does not agree with this proposal and understands the root cause of this issue appears to be due to the network operator not complying with it's obligations under the ETAC and Metering Code.</p> |
| AQP | <p><u>GHD Item 18 – New, Scope of the AQP</u></p> <p>Synergy would like more information on the specific drafting change to the AQP and an explanation of what the issue is in relation to WP and applicant rights. Based on the information presented our preliminary understanding is the change may not be necessary. The AQP in CI4 and other areas makes it clear that the applications are in respect of reference and non-reference services (covered services). Synergy notes that the network access code also deals with a number of schemes and it appears WP is proposing these schemes in relation to access are not required to comply or align with the AQP. Therefore, Synergy would like more information in relation to the scenarios and outcomes WP is contemplating.</p> |
| AQP | <p><u>GHD Item 19 – 2.1, Confidentiality and Disclosure of Information</u></p> <p>Synergy would like more information on the specific drafting change to the AQP and an explanation of what the issue is in relation to WP and applicant rights. Based on the information presented our preliminary understanding is that a change may be warranted. Synergy would like more information in relation to the contemplated scenarios that will apply to the proposed change including how this will work in relation to the transfer provisions under the AQP.</p> |
| AQP | <p><u>GHD Item 20 – CI7.4, Contractually varying the AQP</u></p> <p>Synergy would like more information on the specific drafting change to the AQP and an explanation of what the issue is in relation to WP and applicant rights. Based on the information presented our preliminary understanding is that a change may be warranted. Synergy would like more information in relation to how parties may contractually vary to AQP in respect of an</p> |

| Category | Synergy matters of interest | |
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| | application made under the AQP. | |
| Standard ETAC, GIA scheme and AQP | <p><u>Standard ETAC</u></p> <p>Synergy would like more information on the specific drafting to the Standard ETAC. In particular an explanation on how this instrument will be varied to maintain consistency between the network access code, AQP, proposed GIA scheme and wholesale market rules. Synergy also seeks information and understanding on how WP, applicants and existing user rights will be affected.</p> | |
| Transfer & Relocation Policy | <p><u>Transfer & Relocation Policy (T&L) – Various Changes</u></p> <p>Synergy would like more information on the scenarios that have driven the proposed changes to the T&L including an explanation on how the proposed changes will affect the operation of the AQP and the rights of WP, applicants and existing users.</p> | |

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| Revision No. | Author | Reviewer | Date | Approved for Issue | Date |
|--------------|--------|----------|-----------|---|----------|
| [01] | Lee | Bones | 30/5/2017 |  | 9/6/2017 |
| [02] | Lee | Bones | 11/6/2017 | | |
| | | | | | |

