

Our ref: EDM 57382059  
Contact: Sabina Roshan

30 July 2021

Elizabeth Walters  
Assistant Director Electricity  
Economic Regulation Authority  
Level 4, 469 Wellington Street,  
Perth WA 6000

Submitted via electronic lodgement to [info@erawa.com.au](mailto:info@erawa.com.au)

Dear Elizabeth

**Re: Technical Rules Review Submission – Request for review and approval**

I am pleased to formally submit the proposed amendments to Western Power's Technical Rules, in accordance with Sections 12.50 of the Electricity Networks Access Code 2004 and Clause 1.9.3 of the Technical Rules, for approval by the Economic Regulation Authority (ERA).

Since the Technical Rules commenced on 1 July 2007, except for a mandatory review in 2011 under sections 12.56 to 12.58 of the Access Code, changes and updates to the Rules have been infrequent and relatively minor. As a result, the current version of the Rules no longer fully meet the requirements of the changing needs of the South West Interconnected System's users and operators.

Driven by the need to make the Technical Rules relevant to the industry and to facilitate the changes required by the reforms led by the State Government, a review was commenced in January 2020. Western Power led the review and established a working group comprising of Western Power representatives, Western Power's consultant (GHD), the Australian Energy Market Operator (AEMO), Energy Policy WA (EPWA) and the ERA as an observer.

Based on the recommendations from the working group, Western Power proposes amendments to the Technical Rules that will:

- Align with the requirements of the Wholesale Electricity Market Rules (WEMR) amendments and relevant government policy decisions made by EPWA
- Provide improved clarity on roles and responsibilities for Western Power, AEMO and Users (loads & generators connected to the South West Interconnected Network)
- Provide improved clarity on system performance standards



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- Introduce performance standards for Standalone power systems and Disconnected microgrids
- Improve network investment planning principles and criteria
- Introduce clearer and more suitable performance standards and technical requirements for inverter-based generators, loads and energy storage systems connections
- Improve compliance requirements for Users
- Improve operational planning and coordination of efforts with AEMO

The amendments to the Rules include changes to all existing chapters and attachments, the introduction of a new chapter for Standalone power systems and Disconnected microgrids and the introduction of new attachments.

Attached with this letter are electronic copies of:

- Attachment 1: Technical Rules review submission report. This document provides the justifications for the proposed changes
- Attachment 2: A clean version of the proposed Technical Rules
- Attachment 3: A marked-up version of the current Technical Rules

If the ERA would like to discuss any aspect of our response, please contact Sabina Roshan at [sabina.roshan@westernpower.com.au](mailto:sabina.roshan@westernpower.com.au).

I look forward to receiving the ERA's approval of the proposed amendments.

Yours sincerely



**Zahra Jabiri**  
Head of Regulation and Investment Assurance  
Cc: Jacqui Hall, Chief Financial Officer