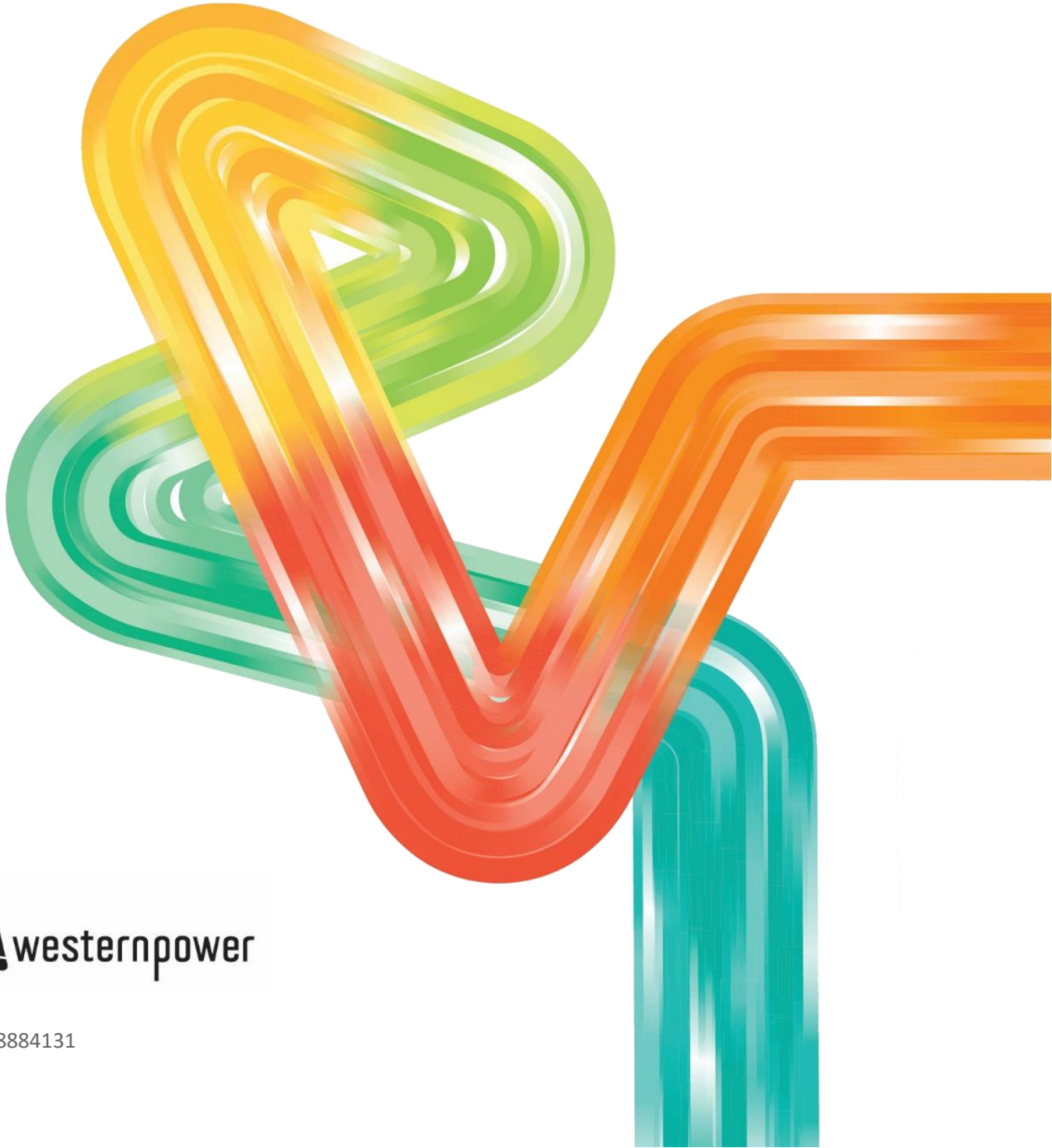
Attachment 6.1

Reference Services Change Summary

Access Arrangement Information

1 February 2022



EDM 58884131

Contents

1. Introduction

Section 5.2(b) of the Access Code requires the access arrangement to specify a reference service for each covered service that is likely to be sought by a significant number of users or end-use customers (including new applicants) or a substantial proportion of the network services market.

This document summarises the proposed changes to the Reference Services for Access Arrangement 5 (AA5) and the rationale for each of these proposed changes. The proposed amendments are designed to improve the functionality and applicability of reference services in response to changing demands. To this end, the changes have been driven by stakeholder feedback which firstly influenced the ERA's Framework and Approach document, leading to a series of requirements.[1] Western Power subsequently met with a number of stakeholders to help clarify their preferences. The feedback has been taken into account in proposing the changes to the reference services for AA5.

This document summarises**:**

- The Access Code requirements pertaining to reference services;
- The proposed changes to the Reference Services for AA5 and the rationale for each of the proposed changes;
- Reconciliation of the proposed changes to the ERA's requirements in the Framework and Approach document; and
- A summary of the stakeholder engagement process, including the feedback received and Western Power's responses.

This summary document supports the proposed changes to Access Arrangement Appendix E: Reference Services , which details proposed changes in both "tracked change" mode and as an unmarked version**.**

[1] Economic Regulation Authority, Framework and Approach for Western Power's fifth access arrangement review, Final decision, 9 August 2021, page 24

2. Requirements of the Access Code

In proposing changes to the Reference Services offered for the AA5 period, Western Power has taken into account the requirements in the Access Code regarding reference services, shown in Figure 1, below.

Figure 1: Required content of an access arrangement – reference services[2]

5.2 An *access arrangement* must:

(a) specify at least one *reference service*; and

(b) specify a *reference service* for each *covered service* that is likely to be sought by (or the benefit of which is likely to be sought by) either or both of:

(i) a significant number of *customers* and *applicant*s; or

(ii) a substantial proportion of the market for *services* in the *covered network*;

and[266]

(c) to the extent reasonably practicable, specify *reference services* in such a manner that a *user* or *applicant* is able to acquire by way of one or more *reference services* only those elements of a *covered service* that the *user* or *applicant* wishes to acquire; and

(d) for the *Western Power Network*[267]— specify one or more *reference services* such that there is both:

(i) a *reference service* which enables a *user* or *applicant* to acquire an *entry service* at a *connection point* without a need to acquire a corresponding *exit* service at another *connection point*; and

(ii) a *reference service* which enables a *user* or *applicant* to acquire an *exit service* at a *connection point* without a need to acquire a corresponding *entry service* at another *connection point*.

5.2A In determining whether an *access arrangement* complies with section 5.2(b), the *Authority* must have regard to any information provided by a person pursuant to section 4.A14.[268]

[2] Proposed amendments to the Electricity Networks Access Code 2004, page 75

3. Proposed amendments

Western Power has identified a number of amendments to the Reference Services, including:

- New and modified definitions;
- New proposed reference services;
- Deletion of several reference services; and
- Grandfathering of a number of services with the addition of similar services but with a different tariff structure and pricing.

The changes have been allocated a Change Identification Number and are summarised in the tables below:

- Table 3.1: Introduction;
- Table 3.2: Exit Services;
- Table 3.3: Entry Services;
- Table 3.4: Bi-directional Services;
- Table 3.5: Ancillary Services; and
- Table 3.6: Annexure 1: Service descriptions (metering).

Table 3.1: Section 1 Introduction

The following changes are proposed to sections 1.1 – 1.6

Change identification Number	Proposed changes	Rationale for change
1.	Amended the definition of *AA4 effective date* and added a definition for *AA5 effective date*	To align with the AA5 period
2	Add definition for "activated device"	Used in reference service D6 – Remote Load/Inverter Control Service. The definition is based on the definition of "Activated Communications Link" in the metering model SLA
3	Add definition for "business day"	Used in new ancillary reference services
4	Add definition for "capital-related costs"	Used in proposed changed wording for reference services B3 – Exit Service Facilitating a Distributed Generation or Other Non-Network Solution and C-15 – Bi-directional Service Facilitating a Distributed Generation or Other Non-Network Solution
5	Add definition for "charge"	Used in multiple references but was not a defined term
6	Add definition for the Electricity Network Access Code ("Code")	The Code is referred to often in Appendix E
7	Add definition for "date for a scheduled meter reading"	Used in a proposed change to Annexure 1
8	Add definition for "distributed generating plant"	Used in proposed changed wording for reference services B3 – Exit Service Facilitating a Distributed Generation or Other Non-Network Solution and C-15 – Bi-directional Service Facilitating a Distributed Generation or Other Non-Network Solution
9	Modify the definition for "MSLA" and "market operator"	To update the definition for AA5

Change identification Number	Proposed changes	Rationale for change
10	Add definition for “non-capital costs”	Used in proposed changed wording for reference services B3 – Exit Service Facilitating a Distributed Generation or Other Non-Network Solution and C-15 – Bi-directional Service Facilitating a Distributed Generation or Other Non-Network Solution
11	Add the definition for “price list”	Used multiple times but was not a defined term
12	Add the definition for “reasonable and prudent person”	Used multiple times but was not a defined term
13	Add definitions for “storage works” and “storage activity””	Used in several new reference services
14	Add definition for “Technical Rules”	Used multiple times but was not a defined term
15	Add definition for “weekly settlement commencement”	Used several times in section 1.4 and section E
16	Add definition for Wholesale Electricity Market Rules (“WEM Rules”)	The WEM Rules are referred to in an eligibility criterion for several reference services
17	Changes to section 1.3 Metering Services	Update the reference services which includes a metering service Update the ‘transitional’ reference services (metering) with ‘standard’ reference service (metering) designations: • connection points with throughput lower than 50MWh/annum • connection points with throughput equal to or greater than 50 MWh/a, prior to weekly settlement commencement • connection points with throughput equal to or greater than 50 MWh/a, after weekly settlement commencement
18	Changes to section 1.6 Transitional Services	Update the applicable reference services

Table 3.2: Exit services

Note: the term 'technical rules' has been changed to 'Technical Rules' and the term 'AS 3000' has been changed to 'AS/NZS 3000' throughout the descriptions of the Exit Services

Change identification Number	Reference service		Proposed changes	Rationale for change
1	A2	Anytime Energy (Business)	Modify the reference service description to include exit points on the high voltage distribution system in the reference service (i.e., in addition to exit points on the low voltage distribution system)	This change is consistent with the requirement of the ERA in its Framework & Approach[3] to amend the business energy-based reference services to allow high voltage end-use customers to access them
2	A2	Anytime Energy (Business)	To eligibility criterion 2 (regarding the maximum demand at the exit point), include high voltage customers with an extended period of dormancy	Provides requested flexibility to HV customers to access the applicable tariff in cases where the HV customer has reduced its power consumption significantly and is unlikely to require its contracted CMD for an extended period
3	A9	Streetlighting	The proposed change confirms that Western Power will maintain the streetlighting assets to **original** design levels .	Western Power's reference to the 'original' design levels is intended to clarify that Western Power will maintain streetlights to the design standard (or level) that prevailed at the time of installation. This is to avoid any misconception that Western Power is responsible for ensuring that streetlights are upgraded to current standards as part of this service
4	A9	Streetlighting	Modify the reference service description for replacement or repair of the streetlighting lamps, luminaires, control equipment and supply wiring that are assessed to be at the end of their serviceable life.	Western Power's asset management strategy is based on only repairing or replacing these streetlighting elements upon failure or if they are damaged
5	A9	Streetlighting	Modify the reference service description to require repair or replacement of the lamps and luminaires if the lumen output no longer meets **original minimum** design levels.	The change is to confirm that the baseline for determining whether repair or replacement of the lamps and luminaires is the original minimum design level, rather than any higher or lower standard

[3] Economic Regulation Authority, Framework and Approach for Western Power's fifth access arrangement review, Final decision, 9 August 2021, page 24

Change identification Number	Reference service		Proposed changes	Rationale for change
6	A12-A17	3 Part Time of Use Energy (Residential) 3 Part Time of Use Energy (Business) 3 Part Time of Use Demand (Residential) 3 Part Time of Use Demand (Business) Multi Part Time of Use Energy (Residential) Multi Part Time of Use Energy (Business)	Introduce an eligibility criterion that references the AA5 effective date	This is to limit the ongoing availability of these reference services to existing users. A new multi-part time of use reference service for new users with time periods as per the Framework and Approach is provided (refer to Super Off-peak Energy reference services)
7	A18 A19	Super Off-peak Energy (Residential) Super Off-peak Energy (Business)	New reference services	New reference services have been created to reflect the time bands required by the ERA in the Framework and Approach. Specifically, multipart time of use services with a super off-peak period. These services will be available for all new and existing customers eligible for these services.

Table 3.3: Entry services

Note: the term 'technical rules' has been changed to 'Technical Rules' and the term 'AS 3000' has been changed to 'AS/NZS 3000' throughout the descriptions of the Entry Services

Change identification number	Reference service		Proposed changes	Rationale for change
1	B1	Distribution	Modify the applicable eligibility criterion to include the requirement for the generator's facilities and equipment to comply with the WEM Rules	The WEM Rules now includes modified requirements for generators connected to the distribution system, so this link has been added in the interests of transparency
2	B1	Distribution	To the Applicable Standard Access Contract section, add that 'As from 18 September 2020 an Electricity Transfer Access Contract may only be entered into on terms consistent with section 2.4C of the Access Code'	This reference notes the Code requirement that as from 18 September 2020 contracts may only be entered into on terms consistent with section 2.4C.
3	B2	Transmission	Modify the applicable eligibility criterion to include the requirement for the generator's facilities and equipment to comply with the WEM Rules	The WEM Rules define the requirements for generator performance standards among other things and so this link has been added in the interests of transparency
4	B2	Transmission	To the Applicable Standard Access Contract section, add that 'As from 18 September 2020 an Electricity Transfer Access Contract may only be entered into on terms consistent with section 2.4C of the Access Code'	This reference notes the Code requirement that as from 18 September 2020 contracts may only be entered into on terms consistent with section 2.4C.
5	B3	Entry service facilitating a distributed generation or other non-network solution	Modify the Reference Service Description to the following: 'An entry service which provides for facilities and equipment comprising distributed generating plant or other non-network solutions connected at a connection point that results in Western Power's capital-related costs or non-capital costs reducing.'	This is a simplification of the previous wording The pricing methodology for applying the prudent discount for the reference service is discussed in the Tariff Structure Statement
6	B3	Entry service facilitating a distributed generation or other non-network solution	Modify the second of the two eligibility criteria as follows: 'The user has submitted an electricity transfer application for this Reference Service.'	The change is to simplify the requirement but does not change the intent

Table 3.4: Bi-directional services

Note: the term 'technical rules' has been changed to 'Technical Rules', the term 'AS 3000' has been changed to 'AS/NZS 3000', and the term 'AS 4777' has been changed to 'AS/NZS 4777' throughout the descriptions of the Bi-directional Services

Change identification number	Reference service		Proposed changes	Rationale for change
1	All existing bi-directional services (where applicable)		Remove reference to the single phase (15kVA) and three phase (30kVA) inverter system size limits [note: the proposed new bi-directional reference services C16-C22 include the proposed change]	Western Power has proposed changes to the Technical Rules which change the inverter size limit for a standard supply service to 15kVA (refer to sections 3.7 and 3.8). If approved, the 30kVA limit is likely to no longer be the relevant de-limiter Reliance is instead placed on the eligibility criterion which requires compliance with the Technical Rules, as this will provide the technical guidance for eligible inverter systems regardless of when or if the proposed revised Technical Rules are approved The proposed wording will not affect consumers who are already receiving these bi-directional reference services
2	C2	Anytime Energy (Business)	Modify the reference service description to include bi-directional points on the high voltage distribution system in the reference service (i.e., in addition to bi-directional points on the low voltage distribution system)	This change is consistent with the requirement of the ERA in its Framework & Approach to amend the business energy-based reference services to allow high voltage end-use customers to access them

Change identification number	Reference service		Proposed changes	Rationale for change
3	C9, C10, C11, C12, C13, C14	3 Part Time of Use Energy (Residential) 3 Part Time of Use Energy (Business) 3 Part Time of Use Demand (Residential) 3 Part Time of Use Demand (Business) Multi Part Time of Use Energy (Residential) Multi Part Time of Use Energy (Business)	Introduce an eligibility criterion that references the AA5 effective date	This is to limit the ongoing availability of these reference services to existing users. A new bi-directional multi-part time of use reference service for new users with time periods as per the Framework and Approach is provided (refer to Super Off-peak Energy reference services))
4	C15	Bi-directional Service Facilitating a Distributed Generation or Other Non-network Solution	The Reference Service Description has been modified to the following: 'A bi-directional service which provides for facilities and equipment comprising distributed generating plant or other non-network solutions connected at a connection point that results in Western Power's capital-related costs or non-capital costs reducing.'	This is a simplification of the previous wording The pricing methodology for applying the prudent discount for the reference service is discussed in the Tariff Structure Statement
5	C15	Bi-directional Service Facilitating a Distributed Generation or Other Non-network Solution	The second of the two eligibility criteria has been modified to the following: 'The user has submitted an electricity transfer application for this Reference Service.'	The change is to simplify the requirement but does not change the intent

Change identification number	Reference service		Proposed changes	Rationale for change
6	C16, C17	Super Off-peak Energy (Residential) Super Off-peak Energy (Business)	These are new bi-directional reference services	New reference services have been created to reflect the time bands required by the ERA in the Framework and Approach. Specifically, bi-directional multipart time of use services with a super off-peak period. These services also allow for additional reference tariffs reflecting new pricing for these services. These services will be variable for all new and existing customers eligible for these services.
7	C18	Low Voltage Distribution storage service	This is a new bi-directional reference service combined with a connection service and a reference service (metering) at a bi-directional point on the low voltage (415 volts or less) distribution system	The introduction of this reference service is consistent with the ERA's Framework and Approach. The LV and HV distribution reference services are provided to allow appropriate tariffs to be applied
8	C19	High Voltage Distribution Storage Service	This is a new bi-directional service combined with a connection service and a reference service (metering) at a bi-directional point on the high voltage (6.6 kV or higher) distribution system	The introduction of this reference service is consistent with the ERA's Framework and Approach
9	C20	Transmission Storage Service	This is a new bi-directional service combined with a connection service and a reference service (metering) at a bi-directional point on the Transmission system	The introduction of this reference service is consistent with the ERA's Framework and Approach
10	C21	Low Voltage Electric Vehicle Charging Service	A new bi-directional service combined with a connection service and a reference service (metering) at an exit point on the low voltage (415 volts or less) distribution system	The introduction of this reference service is consistent with the ERA's Framework and Approach; the LV and HV distribution reference services are provided to allow appropriate tariffs to be applied
11	C22	High Voltage Electric Vehicle Charging Service	A new bi-directional service combined with a connection service and a reference service (metering) at an exit point on the high voltage (6.6 kV or higher) distribution system	The introduction of this reference service is consistent with the ERA's Framework and Approach

Table 3.5: Ancillary services

Note: the term 'technical rules' has been changed to 'Technical Rules' and the term 'AS 3000' has been changed to 'AS/NZS 3000' throughout the descriptions of the Ancillary Services

Change identification number	Reference service		Proposed changes	Rationale for change
1	D2	Capacity Allocation Service	The changes provide the option for a temporary (pre-defined) re-allocation of contracted capacity in the following combinations: a) A user's contracted capacity is decreased at one or more connection points under its access contract with a corresponding increase in contracted capacity at one or more connection points under its own access contracts for one or more intra-day periods, or b) A user's contracted capacity is decreased at one or more connection points under its access contract with a corresponding increase in contracted capacity at one or more connection points under another user's access contract for one or more intra-day periods, or c) A user's contracted capacity at a connection point is decreased under its access contract (expressed as a percentage of the contract maximum demand) with a corresponding increase in contracted capacity to another user at the same connection point under its access contract. The allocated capacity is not further transferable or otherwise delegable. At the end of the specified period the contracted capacity under the user's access contract is reinstated. The eligibility criteria have been modified to: 1. Remove reference to DSOC (i.e., this is a CMD allocation service only) 2. Require, where the capacity allocation is at the same connection point, that: (i) each user at the connection point must agree that Western Power can provide energy data to each user and to AEMO (ii) each user at the connection point enters into a deed	The proposed changes respond to the ERA's Framework and Approach which requires Western Power to combine the capacity swap reference services into a single service to simplify administrative arrangements and to allow the application and use of the service to be addressed under a single electricity transfer application. The rationale for the modifications to the eligibility criteria is: 1. Removing the reference to DSOC is necessary with the introduction of constrained access as this will mean that this service is not applicable to entry services. That is with constrained access DSOC is no longer a firm quantity that can be exchanged. This is consistent with the Minister's changes made to the AQP in July 2021 which limited the swap services to exit services and exit service components 2. (i) The energy data sharing provision is required to enable the arrangement (ii) The required arrangement is to help ensure the contractual and regulatory obligations are fulfilled regardless of the allocation arrangement

Change identification number	Reference service		Proposed changes	Rationale for change
2	D3	Capacity Allocation Swap (Nominee) (Business) Service	Deleted	No longer required after consolidation under reference service D2
3	D4	Capacity Allocation same connection point (Nominator) (Business) Service	Deleted	No longer required after consolidation under reference service D2
4	D5	Capacity Allocation Same Connection Point (Nominee) (Business) Service	Deleted	No longer required after consolidation under reference service D2
5	D6	Remote Load/Inverter Control Service	The modified reference service combines the remote load control service with the remote load limitation service, adding the remote control of inverters to the reference service thereby widening the scope of control beyond limiting a load	Combining the remote load control and load limitation services and expanding it to include control of an inverter via the meter is a requirement of the ERA's Framework and Approach
6	D7	Remote Load Limitation Service	Deleted	No longer required after consolidation under reference service D6 in accordance with the ERA's Framework & Approach

Change identification number	Reference service		Proposed changes	Rationale for change
7	D8 D9	Remote De-Energise Service Remote Re-Energise Service	The reference service has been modified to include the following: 1. An explanation of what the controller/end-use customer is required to do to commence the flow of electricity and arrangements if a controller/end-use customer is not available to commence the flow of electricity 2. A revised description of the eligibility criterion for the capability of the communication equipment	1. This modification is consistent with the ERA required clarification of the eligibility criteria for the remote de-energise and re-energise services 2. Provides a more comprehensive description of the capability required in the context of supporting a remote service
8	D11	Site visit to support remote re-energise service	A new reference service which includes a site visit by Western Power to supplement the Remote re-energise service in cases where the customer is unable to press the required button on the meter to re-energise the property. The ancillary service applies to exit services, entry services, and bi-directional services.	The new reference service is provided in accordance with the requirement of the ERA's Framework & Approach The eligibility criteria are based on ensuring all the pre-conditions for re-energising the property safely are provided
9	D12	Manual de-energise service	A new reference service to manually de-energise a meter by removing supply voltage from all outgoing circuits on a non-permanent basis by Western Power attending to the meter premises. The ancillary service applies to exit services, entry services, and bi-directional services.	This new reference service is included in accordance with the ERA's Framework & Approach
10	D13	Manual re-energise service	A new reference service to manually re-energise a meter by attending the meter premises. The ancillary service applies to exit services, entry services, and bi-directional services.	This new reference service is included in accordance with the ERA's Framework & Approach

Table 3.6: Annexure 1: Reference services (metering) – service descriptions

Change identification number	Reference service		Proposed changes	Rationale for change
1	All		The following statement is made under Table E.1.1 which applies to all the reference services (metering): 'A user may agree the *date for a scheduled meter reading* in accordance with the Metering Code clause 5.3'	This change is required to satisfy the ERA's Framework and Approach to require the meter reference service description to clarify that a user may agree a date for a scheduled meter reading
2	M17	Unidirectional, interval, weekly, manual	A new reference service to provide interval energy data from an interval meter (unidirectional) on a weekly basis.	Requested by the ERA in the Framework and Approach
3	M18	Unidirectional, interval, weekly, remote	A new reference service to provide interval energy data from an interval meter (unidirectional) on a weekly basis	Requested by the ERA in Framework and Approach
4	M19	Bi-directional, interval, weekly, manual	A new reference service to provide interval energy data from an interval meter (bi-directional) on a weekly basis.	Requested by the ERA in Framework and Approach
5	M20	Bi-directional, interval, weekly, remote	A new reference service to provide interval energy data from an interval meter (bi-directional) on a weekly basis.	Requested by the ERA in Framework and Approach
6	N/A		Change to section E.1.2 Permissible reference services (metering) - Revised explanation of compatibility of references (metering) with other reference services in table E.1.2 - Revised table E.1.2	To account for the new reference services
7	N/A		Change to table E.1.3 Eligibility Criteria Services	To account for the new reference services (metering)
8	N/A		Changes to sections E.1.4 and E.1.5	To account for the new reference services (metering) and the change in compatibility with other reference services

4. Reconciliation of proposed changes with the Framework & Approach

On 18 September 2020, the Electricity Networks Access Code 2004 was amended to support the delivery of the State Government's Energy Transformation Strategy. One amendment included the requirement for the ERA to publish a framework and approach document prior to Western Power submitting its next access arrangement proposal in February 2022. The Framework and Approach by the ERA includes the following resolution, which we have taken into account in proposing changes to the Reference Services to apply for the AA5 period.

Figure 2: ERA Framework and Approach – Reference Services[4]

Western Power must retain the current reference services with the following amendments:

- Modify the following existing services:
  - Entry reference services and capacity allocation swap services must be amended to reflect the introduction of constrained access.
  - The time of use periods must be modified to reflect forecast demand patterns for AA5. The required time periods are:
    - Super off-peak – 9am to 3pm
    - Peak – 3pm to 9pm
    - Shoulder – 6am to 9am and 9pm to 11pm
    - Off–peak – 11pm to 6am
  - Amend the business energy-based reference services to allow high voltage end-use customers to access them.
  - Amend the meter reference service description to clarify that a user may agree a date for a scheduled meter reading. Combine the capacity swap reference services into a single service to simplify administrative arrangements and allow the application and use of the service to be addressed under a single electricity transfer application.
  - Combine the remote direct load control and load limitation services and expand to include control of an inverter via the meter. Update the eligibility criteria to ensure it is clear the service is available to three phase connections and clarify the requirements to obtain the service.
  - Clarify the eligibility criteria for the remote de-energise and re-energise services to explain what the controller/end-use customer is required to do to commence the flow of electricity and arrangements if a controller/end-use customer is not available to commence the flow of electricity.
  - Include manual de-energisation and re-energisation as reference services under the access arrangement, consistent with remote de-energisation and re-energisation services.
  - Remove eligibility criteria that is covered in the standard electricity contract and applications and queuing policy.
- Introduce new reference services for:
  - Transmission connected storage systems
  - Distribution connected storage systems
  - Electric vehicle charging points

[4] Economic Regulation Authority, Framework and Approach for Western Power's fifth access arrangement review, Final decision, 9 August 2021, page 24

The table below summarises the ERA's Framework and Approach and Western Power's response.

Table 4.1: Reconciliation of changes with the ERA's Framework & Approach (Reference Services)

Item number	ERA requirement	Table 3 reference	Comment
1	Entry reference services and capacity allocation swap services must be amended to reflect the introduction of constrained access	Table 3.3 Table 3.5, Change Identification Number 1	The entry reference service (B1, B2, B3) changes are described in Table 3.3 The capacity allocation swap service (D2) changes are described in Table 3.5
2	The time of use periods must be modified to reflect forecast demand patterns for AA5. The required time periods are: - Super off-peak – 9am to 3pm - Peak – 3pm to 9pm - Shoulder – 6am to 9am and 9pm to 11pm - Off–peak – 11pm to 6am	N/a	The time-of-use periods specified by the ERA in the Framework and Approach will be included in the Tariff Structure Statement and will be reflected in the pricing methodology for new multi part time of use residential and business services. The time bands are not required to be incorporated in the eligibility criteria The new services are essentially the same as the existing services but with the new time bands and pricing. The applicable reference services are: • A18 Super Off-peak Energy (Residential) – exit service • A19 Super Off-peak Energy (Business) – exit service • C16 Super Off-peak Energy (Residential) – bi-directional service • C17 Super Off-peak Energy (Business) – bi-directional service The existing exit and bi-directional multi part time of use services (residential and business) will be retained for existing users of those services
3	Amend the business energy anytime - reference services to allow high voltage end-use customers to access them	Table 3.2, Change Identification Numbers 1 and 2	The eligibility criteria in reference services A2 - Anytime Energy (Business) has been updated to include high voltage customers with an extended period of dormancy
4	Amend the meter reference service description to clarify that a user may agree a date for a scheduled meter reading	Table 3.6, Change Identification Number 1	Western Power has amended the meter reference services to clarify that a user may agree a date for a scheduled meter reading. System compatibility/capability issues may arise and will need to be resolved between Western Power and retailers

Item number	ERA requirement	Table 3 reference	Comment
5	Combine the capacity swap reference services into a single service to simplify administrative arrangements and allow the application and use of the service to be addressed under a single electricity transfer application	Table 3.5, Change Identification Numbers 1-4	The capacity swap reference services (D2-D5) have been combined into a single ancillary service (D2) as required Reference services D3-D5 have been deleted (noting there were no users of these services)
6	Combine the remote direct load control and load limitation services and expand to include control of an inverter via the meter. Update the eligibility criteria to ensure it is clear the service is available to three phase connections and clarify the requirements to obtain the service	Table 3.5, Change Identification Numbers 5, 6	The remote direct load/inverter control service has been created by modifying the existing D6 service to include inverter control via the meter Currently this service is not available on a three phase connection point as the dual element meters are not yet available from the supplier. As they become available the service will include these. The service does not specify single or three phase, which provides the flexibility to provide the service to three phase connections when it is technically possible to do so.
7	Clarify the eligibility criteria for the remote de-energise and re-energise services to explain what the controller/end-use customer is required to do to commence the flow of electricity and arrangements if a controller/end-use customer is not available to commence the flow of electricity	Table 3.5, Change Identification Numbers 7, 8	Explanations have been added to Reference Services D8 and D9 A new reference service D11 has been added providing for Western Power to attend the premise to provide a manual re-energise service (by pushing a button on the suitably equipped meter) in cases where the customer is unable to do so Western Power will provide instructions for remote re-energisation to the relevant retailer (for passing on to the relevant customers)
8	Include manual de-energisation and re-energisation as reference services under the access arrangement, consistent with remote de-energisation and re-energisation services	Table 3.5, Change Identification Numbers 9, 10	The new reference services have been added as required

Item number	ERA requirement	Table 3 reference	Comment
9	Remove eligibility criteria that are covered in the standard electricity contract and applications and queuing policy	n/a	The basis for this requirement was actually Western Power's feedback on the ERA's Framework and Approach issue paper. Western Power noted by example that there may be an opportunity to remove the eligibility criterion regarding consumer facilities and equipment needing to comply with the technical rules, given that it is also a requirement within the standard ETAC. However, we also noted in our submission, the following (p13): However, while a rationalisation of eligibility criteria through the framework and approach may be beneficial, there is a risk that at the conclusion of the access arrangement review, important considerations may not be addressed. For example, an eligibility criterion may be moved to become a contractual requirement of the ETAC which will not be considered after the F&A (and therefore eligibility criteria) are finalised. Also, any rationalisation will need to consider whether existing access contracts will be able to accommodate changes to the eligibility criteria structure. After further consideration, Western Power considers that in light of this identified risk and to provide transparency in the eligibility criteria, it is appropriate for Western Power to declare the most relevant obligations, including, in some reference services, the WEM Rules, the WA Electrical Requirements, AS/NZS 3000, and AS/NZS 4777
10	Introduce new reference services for: 1. Transmission connected storage systems 2. Distribution connected storage systems 3. Electric vehicle charging points	Table 3.4, Change Identification Numbers 8-12	As required, Western Power has added the following reference services: C18 Distribution storage service LV C19 Distribution storage service HV C20 Transmission storage service C21 Electric Vehicle Charging Service LV C22 Electric Vehicle Charging Service HV

5. Stakeholder Engagement Summary

5.1 Approach

Western Power held workshops with Synergy, Alinta Energy, Perth Energy, Tesla, and other parties interested in the new Electric Vehicle Charging reference services.

5.2 Western Power consideration of Stakeholder responses

The summaries of the issues raised are categorised as follows:

- Table 5.1: Exit services issues;
- Table 5.2: Entry services issues;
- Table 5.3: Bi-directional services issues;
- Table 5.4: Ancillary services issues; and
- Table 5.5: Other issues.

Note:

(i) Matters raised that are similar to the matters discussed in the reference services section of the ERA's Framework & Approach are not repeated as Western Power has sought to comply with the ERA's requirements (refer to section 4 of this document);

(ii) Matters raised that are identical or nearly identical across more than one Reference Service are not repeated; and

(iii) To protect the identity of the stakeholders, they are referred to as Stakeholder 1, Stakeholder 2, etc.

Table 5.1: Exit services issues

Applicable Reference Service	Issues raised	Western Power response
A1 – Anytime Energy (Residential)	**Stakeholder 1** 1. Stakeholder 1 proposed removing the following eligibility criterion: '*The meter is configured to measure the transfer of electricity out of the Western Power Network.'* Rationale: the eligibility criteria in Appendix E are intended to apply to a network user. Under a user's ETAC with Western Power, a user must comply with the reference service eligibility criteria to receive a particular reference service A user cannot comply with this requirement as it is Western Power's function to install, operate and maintain a meter, not a network user. In the event WP elects to not change a meter (or cannot) a user will be denied the reference service. The Electricity Industry Metering Code specifies the metering configuration requirements for transport services. Accordingly, the metering configuration requirements should be deleted wherever it occurs in Appendix E as it is not a user requirement and is addressed by other regulatory instruments 2. Stakeholder 1 proposed adding the following eligibility criterion: *'Where the User does not use this service for the conveyance of electricity through the transmission system the User will not be charged the transmission tariff component.'* Rationale: the eligibility criteria need to reflect supply arrangements where a user does not use the transmission system such as standalone power systems (SPS), distributed microgrids and distributed connected storage. This requirement should be reflected in all distribution reference services as it is a reference service requirement consistent with ENAC clause 5.2	1. This eligibility requirement provides transparency and forms the basis for the appropriate configured meter to be installed to receive the service following the application for the service by the user; Western Power determines the appropriate meter configuration and recovers the cost of configuring the meter on a user pays basis; accordingly. the eligibility criterion has not been removed from the proposed Appendix E for AA5 2. Stakeholder 1's position is not consistent with the intent of the ERA who in the Framework and Approach process,[5] ruled out a separate service for SPS (i.e. where the generation cost may have been passed back to Stakeholder 1); the end-use customers supplied by stand-alone power systems continue to pay the same charge and all network users benefit from the savings that arise on the understanding that Western Power can install SPS only where it satisfies the new facilities investment test. Embedded Micro-grids and distribution connected storage will still be connected to the network (even if temporarily); the electrons will come from anywhere in the Transmission and Distribution System and the connection will use the whole network, including energy supplied through the Transmission System, to provide energy to the customer. Furthermore, the ERA has required a single form of price control in cases where the Transmission and Distribution charges are part of a bundled business. It therefore does not seem consistent with its intent to carve out connections to be distribution only.

[5] Economic Regulation Authority, Framework and Approach for Western Power's fifth access arrangement review, Final decision, 9 August 2021, p9

Applicable Reference Service	Issues raised	Western Power response
A3 – Time of Use Energy (Residential)	Stakeholder 1 was opposed to limiting the Time of Use Energy (Residential) Service and other applicable reference services to existing customers only. Rationale: The service limitation should be removed from Appendix E (wherever it occurs) on the basis it does not meet our service requirements and the ENAC section 5.2 in the absence of certainty regarding the multi-part time-of-use reference services (particularly the timing)	Western Power has modified eligibility criterion 3 which now links the provision of the service to the AA5 effective date to provide for grandfathering of services under this service with new connections offered the option of selecting from the new Super Off-peak Energy reference services with ERA-specified time periods for differentiating charges Western Power does not agree with the removal of the eligibility criterion as it provides for the transition to the new Super Off-peak reference services Refer to Table 3.2, Change Identification Numbers 3, 8 Refer to Table 3.4, Change Identification Numbers 3, 7
A9 Streetlighting	Stakeholder 1 proposes deleting the word 'original' pertaining to design level (or standards), which Western Power had added Rationale: The stakeholder did not understand the intent of the deletion and would appreciate WP's advice	Western Power's reference to 'original' design levels is intended to clarify that Western Power will maintain streetlights to the design standard (or level) that prevailed at the time of installation to avoid any misconception that Western Power is responsible for ensuring that streetlights are upgraded to current standards as part of this service. Refer to Table 3.2, Change Identification Numbers 4-6
A18 – Super Off-peak Energy (Residential)	1. Stakeholder 1 has asked Western Power to confirm that this is the new TOU reference service outlined in the ERA's final framework and approach decision 2. Stakeholder 1 requires the multi-part TOU reference services to include the pricing methodology in the form of multipliers for the ERA-specified time bands, consistent with ENAC clauses 2.7(a), 2.8(d) and 5.2.	1. Western Power confirms that this is a new TOU reference service outlined in the ERA's Framework and Approach 2. Whilst Western Power considers that (i) the proposed multipliers are useful as guideline for setting the tariffs for this reference service, (ii) if WP can achieve appropriate pricing using these multipliers, it will, although Western Power will not remove its flexibility to operate outside of these bands as it continues the transition to cost reflective tariffs

Table 5.2: Entry services issues

Applicable Reference Service	Issues raised	Western Power response
B1 - Distribution entry service B2 - Transmission entry service	**Stakeholder 1** 1. Sought clarity as to how this service will operate under ENAC clause 2.4C. For example, for arrangements post Sept 2020, will the DSOC (non-fixed) charge component only be payable if the generator has been dispatched? If this is the case how does Western Power ensure there is no double recovery? 2. Does WP proposed to charge generators under a post Sept 2020 arrangement a DSOC charge for capacity they will never use because they are never dispatched? 3. What changes is Western Power proposing under the Applications and Queuing Policy (AQP) in relation to contracted capacity to determine whether this will affect its use of the service?	1. The reference service is a combination of things: (i) The eligibility to use the service, which is currently limited to having a correctly installed meter and complying with the Technical Rules, etc (ii) Having an appropriate contract in place for the connection point. The change to the Code means that contracts for connection points pre-Sept 2020 are unconstrained, all contracts for connection points post-Sept 2020 are constrained per the conditions in the newly created/approved model ETAC developed in July 2021 (iii) Paying the applicable tariff. This was discussed with EPWA extensively and it was accepted that no changes need to take place as a result of constrained access. DSOC is about the ability to use network capacity, that's it. AEMO will make the determination of how often that generator can generate at its DSOC. If the generator is connected to a particularly heavily constrained part of the network, they may not get dispatched but can pay for a network augmentation. The point of constrained access was to not require that the augmentation happens in all cases, it becomes a choice. 2. The way that the ETAC and appendix E work together is that if Stakeholder 1 currently has a generator that was connected pre-Sept 2020, then nothing changes – it meets the eligibility criteria, it has an appropriate contract and it is paying the applicable tariff. No additional reference service is required. It is unnecessary duplication to have two versions of the reference service that will essentially say the same thing, with the exception of the contract provisions – which are already sufficiently dealt with by the current processes 3. Western Power's proposed changes to the AQP will be provided via a Change Summary document and tracked-change version of the AQP which will be submitted to the ERA with Western Power's AA5 proposal. Western Power will separately discuss the changes relevant to this entry service with Stakeholder 1. Western Power also now proposes adding 'WEM Rules' to eligibility criterion 2 of B1-B2 given the changes to the WEM Rules pertaining to generators (i.e., for generators connected to either the distribution system or the transmission system).

Applicable Reference Service	Issues raised	Western Power response
B3 – Entry service facilitating a distributed generation or other non-network solution	**Stakeholder 1** 1. Proposed replacing Western Power's Reference Service description with: *'A service where WP is required to calculate and provide a discount consistent with clauses 7.9 and 7.10 of the ENAC and the Economic Regulation Authority's "Guideline on factors that will be considered in new facilities investment test determinations including methods to value net benefits."* 2. Proposed deleting the following eligibility criterion: *'All of the eligibility criteria for entry service B1 are met; and'* Rationale: This condition is not applicable because the user is already operating on a Covered Service. Further, stakeholder 1 does not agree the B3 service should be contingent on meeting the eligibility criteria for the B1 service consistent with ENAC clause 5.2 as it limits access to and use of the service 3. Proposes modification of eligibility criterion 2 as follows: '*The user has submitted an electricity transfer application for a Distributed Generation or Other Non-Network Solution Service and that application is approved this Reference Service.'*	1. Western Power proposes a revised description, based on a combination of Stakeholder 1's suggestion and Western Power's original description as follows: *'An entry service which provides for facilities and equipment comprising distributed generating plant or other non-network solutions connected at a connection point that results in Western Power's capital-related costs or non-capital costs reducing.'* The Tariff Structure Statement will include the pricing methodology for providing prudent discounts 2. Western Power considers that reference to the eligibility criteria in B1 is appropriate for transparency of the requirements 3. Western Power has adopted Stakeholder 1's suggestion

Table 5.3: Bi-directional services issues

Applicable Reference Service	Issues raised	Western Power response
C16 Super Off-peak Energy (Residential) Bi-directional Service C17 - Super Off-peak Energy (Business) Bi-directional Service	**Stakeholder 1** required visibility in relation to the transitionary arrangements for existing time-of-use (TOU) reference services to new ToU services, including grandfathering provisions	Grandfathering existing reference services: The ERA Framework and Approach states: *The time of use periods must be modified to reflect forecast demand patterns for AA5. The required time periods are: – Super off-peak – 9am to 3pm – Peak – 3pm to 9pm – Shoulder – 6am to 9am and 9pm to 11pm – Off–peak – 11pm to 6am* As such, WP proposes to allow for the Grandfathering of all other TOU reference services that do not meet these time periods. The intention of this change is to allow for Grandfathering of customers already on these tariffs but not for new customer to access these services. This will be reflected for all existing Residential and Business TOU services The management of compliance with technical requirements is established under section 1.9 of the Technical Rules (Variations and exceptions from these rules) Pricing: Western Power will take into account pricing structure and parameter suggestions from Stakeholder 1 in finalising the Tariff Structure Statement
C18, C19 - Distribution storage service	**Stakeholder 1** 1. Requires the service for battery inverter systems rated up to a total of 30 MVA for business customers 2. Is there any technical standard or other limitation on use of battery storage (between 2PM-9PM)?	1. The service is available for inverter systems rated as shown in the eligibility criteria for LV (1MVA, 1000kVA), but there are no restrictions on storage/inverter size in the proposed HV and transmission reference services. However, the equipment must comply with the requirements of the Technical Rules, the WA Electrical Requirements, AS 3000 and AS 4777. 2. There is no technical limit on the operation of battery storage during certain times of the day. Other than the compliance of the facilities with the Technical Rules and compliance otherwise with the terms of the connection agreement, the Reference Service eligibility criteria will not place restrictions on the application of the storage (e.g., for voltage control, frequency control, demand management, etc).

C18, C19 - Distribution storage service and C20 - Transmission storage service	**Stakeholder 1** 1. Western Power's planned offer of 3 storage system reference services (and 3 tariffs) and Stakeholder 1's requirements for maximum flexibility by having access to 7 tariffs – either via up to 3 x tariffs per Reference Service or via 7 x reference services with 1 x tariff per service. Stakeholder 1 advises that its billing system can handle 3 x tariffs per Reference Service. i.e. Storage: LV Storage Service – MPTOU Energy Tariff (Business) HV Storage Service – MPTOU Energy Tariff (Business) HV Storage Service – Max Demand Tariff HV Storage Service – CMD Transmission – MPTOU Energy Tariff (Business) Transmission – Max Demand Tariff Transmission – TRT1 2. Proposes removing the following eligibility criterion: *The connection point will be used for the sole purpose of energy storage;* Rationale: the criterion unreasonably limits access to the service, notwithstanding it is a bi-directional service at a connection point. For example, as drafted it would prohibit situations where a customer has a solar system in conjunction with battery storage. Further Stakeholder 1 considers the Western Power requirement does not relate to the transfer of electricity at a connection point as it purports to determine how a person must use equipment and facilities that they own. The ERA's Framework and Approach did not require a battery storage reference service to be limited to the "sole purpose of energy storage". It was clear from the ERA's decision that network usage could be increased by battery storage offering a range of services to network operators and electricity consumers. Stakeholder 1 instead proposed including the replacement eligibility criterion	1. Stakeholder 1 requested multiple variants for each voltage level (415V, 6kV and Transmission), however WP has proposed one service and one tariff for each voltage level based on the operation of existing storage services (i.e., community power banks) and the expected operation of storage systems explored in the Whole of System Plan and Network Opportunities Map. From a billing perspective, as Stakeholder 1 proposed suite of tariffs was not raised during the Framework and Approach process, Western Power did not undertake public consultation on the requirement for the multiple tariffs as proposed by Stakeholder 1 nor confirm or otherwise the capability of all retailers' billing systems to accommodate multiple tariffs under a single reference service Furthermore, Western Power does not currently have sufficient information to undertake price modelling for the additional service/tariff combinations requested In the absence of a compelling demonstration from Stakeholder 1 that there will be demand for the six additional storage system/tariff combinations, Western Power proposes to: • Offer the three storage system reference services • Work with retailers to derive non-reference services for other storage/tariff combinations if required • Depending on demand, include additional reference services for storage systems in AA6 2. Removing the eligibility criterion - the services being offered are for direct connection (i.e., not behind-the-meter arrangements) of storage systems only. Any other connection type (e.g., a storage and renewable facility), could be connected under the bi-directional connection services To help avoid confusion, Western Power has included definitions of storage works and storage activity in Appendix E

Applicable Reference Service	Issues raised	Western Power response
	'Energy storage must be installed at premises utilising the connection point.'	
Storage C18, C19, C20	**Stakeholder 4** 1. Western Power seems to be focussed on commercial industrial batteries. Has Western Power considered Virtual Power Plant (VPP) orchestrated facilities? 2. A big issue is the CMD charge 3. Requires to be able to access its own connection point, even when batteries are within an embedded network (e.g., retail shopping centre) – multiple NMIs in a switch room would be required, with the stakeholder paying its own demand charges	1. VPP batteries will exist behind existing connection points. The proposed reference service is only for batteries with their own connection point. As a distribution system operator, Western Power may buy from a VPP, but the VPP will be charged according to the connection point tariff 2. The pricing structure will seek to encourage behaviour that benefits the system, with a discount to help manage system low (discharge) or system peak (charge); it is positioned as a time of use (TOU) demand charge 3. Western Power acknowledges the issue and the option of multiple NMIs is being considered; Western Power will revert to stakeholders with an answer as soon as possible
Electric vehicle charging service C21, C22	**Stakeholder 5** 1. Who can use the service? Is an eligibility criterion that the party deploying a standalone EV charging facility must use this reference service or can they use an existing reference service? 2. Does Western Power allow two connections onto one lot because some NSPs strictly disallow that (noting that most lots would have a connection already)? Does the answer depend on the size of the charger (e.g., 2 x 300 kW chargers)? Other feedback: General support for Western Power to offer both an LV (415V) and MV (11-22kV) electric vehicle charging service	Western Power described the new electric vehicle charging reference service which (i) if approved, will apply from 1 July 2022, and (ii) aligns with the requirements of the ERA's Framework and Approach 1. The service is for non-residential applications and not behind-the-meter applications; Western Power expects that most charging stations will be behind the meter or to be combined with some other service; however, this reference service will typically be used if it is a standalone charging station (e.g., fast or super-fast charger) and Western Power expects that a separate connection would be required – could be at LV (415V) or MV (11-22kV) 2. Western Power's preference is for one connection point per lot but is still considering whether more than one connection per lot is achievable, but acknowledges that there is the desire from the market to have the option of two connections on one lot

Applicable Reference Service	Issues raised	Western Power response
	Stakeholder 1 seeks the following reference services for similar reasons to those presented for the storage systems reference services: • Low Voltage EV charging service – MPTOU Energy Tariff (Business) • Low Voltage EV charging service – Max Demand Tariff • Low Voltage EV charging service – TRT1 • High Voltage EV charging service – MPTOU Energy Tariff (Business) • High Voltage charging service – Max Demand Tariff • High Voltage EV charging service – TRT1 **Stakeholder 6** seeks a TOU reference tariff for the Low Voltage EV charging service	Western Power's response to Stakeholder 1's proposed addition of four alternative reference service/tariff combinations is similar to that for Storage systems (above), that is, Western Power proposes to: • Offer the two electric vehicle charging reference services • Work with retailers to derive non-reference services for other EV charging/tariff combinations if required • Depending on demand, include additional reference services for EV charging in AA6 Western Power's response to Stakeholder 6's proposed reference tariff is to include this tariff for the Low Voltage EV charging service

Table 5.4: Auxiliary services issues

Applicable Reference Service	Issues raised	Western Power response
D2 - Capacity Allocation Service	**Stakeholder 1** Capacity in the network should be able to be temporarily re-allocated to an alternate customer where the primary customer has identified that they will have a material reduction in demand for a period of time. <u>Relocation requirements</u> CMD (e.g., of not less than 1MVA) should be able to be re-allocated on a temporary basis for not less than 1 day from: 1. A connection point to another connection point on the same feeder 2. A connection point to another connection point on a different feeder, but from the same sub-station 3. A connection point to another connection point from a different substation <u>Technical Feasibility Study requirements</u> For various capacity relocations feasibility studies may be required but these are to be completed in an efficient and timely manner. For example: 1. Same feeder – no feasibility study is required 2. Different feeder / same substation – simple feasibility study 3. Different substation – simple to complex feasibility study <u>Customer requirements</u> The relocation of capacity may occur between : 1. A customer with connection points with the same retailer 2. A customer with connection points with different retailers 3. Different customers with connection points with the same retailer 4. Different customers with connection points with different retailers <u>Desired outcomes</u> Simplicity and accessibility for customers and a reference service accessible to customers, providing options to temporarily re-locate excess capacity, within the confines of the reference service and network capability.	<u>Allocation options</u> The Reference Service allows for CMD swaps between different connection points, and for the requested four customer connection point and retailer combinations required by Stakeholder 1 <u>Technical feasibility studies</u> Western Power will work with stakeholders to streamline access to this service, however technical feasibility studies will be the default requirement for each reallocation scenario; this is because in all but a few circumstances, even when the swap occurs from one connection point to another on the same feeder, there may be unacceptable impacts on other customers

Applicable Reference Service	Issues raised	Western Power response
D2 - Capacity Allocation Service	**Stakeholder 2** 1. How does the reference service operate in a constrained part of the network, such as the Eastern Goldfields (EGF)? Would it impact someone waiting for capacity in the EGF? 2. Does the reference service create a competitive advantage for Synergy? 3. Could a retailer stop the swap from proceeding? 4. Will Western Power put the CMD in the standing data? 5. Could Western Power standardise terminology? e.g., RT6 is sometimes referred to as LVMD in billing data 6. Does Western Power provide compensation for not meeting reliability standards? Is it automatic?	1. The eligibility criteria requires there to be capacity available at the connection point. If no capacity is available, the AQP provisions would apply to any request to increase capacity. 2. While the relative size of Synergy's customer base may give them an advantage with this service, the service is not able to bypass the queuing requirements for capacity covered under the AQP. 3. For a swap to proceed between two connection points covered by two retailers, both retailers would need to consent to the swap and submit an application. 4. This is an operational matter, however Western Power notes that any amendment to the standing data structure requires Market-wide consultation and subsequent System upgrades 5. Western Power confirmed that standing data refers to LVMD, and that invoices refer to LVMD and RT6; Western Power will progress this as an operational matter with the objective of standardising the terminology 6. In general, Western Power does not provide direct compensation for meeting reliability standards. For service standards that are subject to the Service Standard Adjustment Mechanism, Western Power's revenue target is adjusted in the next access arrangement period for under or over performance against the service standard targets. All customers will receive a share of any penalty incurred under that mechanism.

Applicable Reference Service	Issues raised	Western Power response
D6 - Remote load/Inverter control service	**Stakeholder 1** queried how the service was being delivered in AA4 Stakeholder 1 required the following from the service: 1. A service to send a command to an activated device for the variable control of a load and generation export at a connection point from a remote locality 2. The service does not include any site visits from Western Power 3. The instruction to control the electricity transferred through the connection point is planned to be submitted as a percentage of the maximum export or consumption capacity 4. The service be delivered within 5 minutes after the request has been received Stakeholder 1 advised that its was 'technology agnostic' and sought to understand what Western Power could provide in relation to the service	This service has not been used during the AA4 period Western Power has updated the eligibility criteria for this service to be "technology agnostic" by changing references to "meter" to "activated device" Currently, Western Power cannot offer an AA5 reference service to meet Stakeholder 1's requirements for a variable control of a load or a generator at a connection point from a remote locality (i.e., dynamically limiting or tripping excess export) - this is because the technology is currently not available Western Power can offer the following reference service features: (a) Binary control of a load or an inverter via a multi-element advanced meter - that is, the load or PV inverter (or both, in the case where the PV inverter is on the same circuit as load) is either on or off (b) Binary control of two circuits (e.g., two load circuits or a load and inverter, if the latter is on a separate circuit) if a multi-element advanced meter is installed (c) Response times will be up to 60 minutes for remote control (d) The meters are not capable of limiting demand up to a certain set point; rather if the demand/export limit is hit, the device will automatically be switched off If at some point prior to or during the AA5 period the required variable control service can be provided (following adequate testing), this would likely be offered as a non-reference service in the AA5 period

Applicable Reference Service	Issues raised	Western Power response
	Stakeholder 3 asked for clarification about the service (i.e., control via the meter)	Western Power explained the key features of the reference service which has been expanded to include inverters as required by the ERA in its Framework and Approach. The salient points were: • Metering capability to interrupt loads/inverter needs to be enabled by directly connecting the load (e.g air conditioner) and/or the PV inverter from/to the meter • Variable control of loads/inverter is not possible with available meter technology; just on or off functionality • Retailers may apply 3rd party options (e.g., via Wi-Fi) to control inverter output • The metrology procedure and metering Code describe gross versus net metering
D8 Remote de-energise service D9 Remote re-energise service	**Stakeholder 1** 1. What is the controller required to do in order to commence the flow of electricity, including what training or direction Western Power will provide to the controller and how the user may direct the customer or controller to this information? What does Western Power propose to do if a controller/customer is not available to commence the flow of electricity? 2. Its preference is for a bundled service and pricing (i.e., Western Power provides a turn-key service, including site attendance if necessary to 'push the button' to re-energise if the customer/controller is unable to do so).	1. To be eligible, the customer must (i) have an AMI meter with enabled communications and (ii) be able and willing to push the button on the meter themselves (to re-energise) otherwise they can select the manual re-energise reference service; Western Power will provide instructions for the remote re-energise service; to this end, Western Power will liaise with stakeholders to confirm the operational arrangements, including who communicates with the end-customer/controller 2. Western Power is offering three Reference Services in relation to remote de-energisation and re-energisation of supply; each will be separately priced A turnkey or bundled service (i.e., re-energisation, de-energisation, and site visit) will not be offered for AA5 because Western Power does not have sufficient information to price a bundled service without adding significant risk margin Western Power is not aware of any circumstance where the customer will be unable to access the meter 'push button' required as part of the re-energisation process due to a barrier or some other constraint caused by Western Power; on this basis, Western Power will offer a single price for Reference Service D12 – Site Visit to Support Remote Re-energisation.

Applicable Reference Service	Issues raised	Western Power response
D13 - Manual De-energise service D9 - Manual Re-energise service	**Stakeholder 1** sought confirmation from Western Power that the service description, service standard and pricing will be the same as in the MSLA	Western Power confirmed that the service description and service standard would be the same as in the model service level agreement Pricing is being determined separately

Table 5.5: Other issues

Applicable Reference Service	Issues raised	Western Power response
Metering & data service	Can **Stakeholder 3** as a retailer receive interval data?	Yes – metering data will be provided to retailers and to AEMO as part of the applicable reference services
Metering & data service	**Stakeholder 1** queried how AMI meters will be covered by reference services (metering) for AA5 and the pricing for receiving daily interval data from an AMI meter	Western Power confirmed that retailers will be able to receive daily interval data from AMI meters via reference services (metering) M7 and M14 Pricing is being determined separately