

31 January 2025

Ms Elizabeth Walters  
Economic Regulation Authority

By email: info@erawa.com.au  
CC: elizabeth.walters@erawa.com.au

Dear Ms Walters,

### **Horizon Power Pilbara Ringfencing Rules – submission on proposed amendments**

Thank you for the opportunity to comment on Horizon Power's Pilbara Ringfencing Rules. APA welcomes the proposed changes. We understand the changes are primarily designed to address instances of non-compliance with the ringfencing rules published by the ERA in October 2024.

The updates to Horizon Power's Pilbara Ringfencing Rules make clear that the ringfencing arrangements apply to Horizon Power's "other businesses". This is consistent with the Pilbara Networks Access Code requirements and with the approach adopted by APA in its own ringfencing rules for the APA DEWAP network.

Building on Horizon Power's proposed changes, we suggest consideration be given to the following:

- Ringfencing training being refreshed at least annually consistent with the remediation action for breaches of the ringfencing rules,<sup>1</sup> and which better aligns with the six-monthly Pilbara Green Link Team reminders.<sup>2</sup>
- Ringfencing training and other reminders be incorporated into Horizon Power's compliance management systems so that reminders are automated and not dependent on individual staff.

APA appreciates the transparency offered by Horizon Power in updating its ringfencing rules. Adherence to approved ringfencing rules is an important tool in facilitating the competitive development and operation of power systems in the Pilbara.

Development of the Pilbara's power systems is critical for the realisation of the West Australian Government's Pilbara Energy Transition Plan, which seeks to accelerate decarbonisation by facilitating new, common use electricity transmission infrastructure in the Pilbara and unlock the best renewable resources.

Thank you again for the opportunity to comment on the proposed amendments. [REDACTED]

Yours sincerely,

[REDACTED]

<sup>1</sup> Horizon Power, Ringfencing audit – status of remediation actions, undated, p. 1.

<sup>2</sup> Horizon Power, Ringfencing audit – status of remediation actions, undated, p. 4.