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Mr James Campbell-Everden
Chief Executive Officer
Pilbara ISOCO Limited
Via submission portal

INTENDED FOR PUBLICATION

Dear James

Submission on Interim Visibility List Procedure

1 Executive summary

To enable the Pilbara Independent System Operator (ISO) to perform its system security functions under the Pilbara Network Rules (Rules), the ISO Control Desk needs visibility of generators and their control systems. Woodside supports this system security objective. Subchapter 4.3 of the Rules sets out how accurate and timely information is to be provided to the ISO Control Desk. The Interim Visibility List Procedure details the necessary signals for the Visibility List and how to modify the Visibility List, while maintaining confidentiality. Woodside suggests amending the Procedure for clarity on signal requirements for a Connection Point Compliance (CPC) facility and the process for Visibility List implementation and modification.

2 Introduction

Woodside appreciates the opportunity to provide feedback on the Interim Visibility List Procedure (Procedure)¹ which came into effect on 6 November 2023. Woodside is of the view that the Procedure requires some amendment to align the signals requirements and the overall process for providing visibility of a facility within Network Operator powers. Further, the Procedure would benefit by providing further clarity for an access seeker on the implementation of the relevant level of visibility.

3 Provision of signals for visibility

Appendix B and C of the Procedure outlines the minimum content, characteristics and timing of signals and data which must be visible to the ISO Control Desk for existing and new connections.

Issue: As per the Procedure, certain signals and data must be visible to the ISO Control Desk, which is known as the Visibility List. However, the Visibility List does not distinguish between new proponents who connect under the standard connection procedure and those who connect under the CPC connection procedure. The instructions which can be provided to a CPC facility are limited relative to non-CPC Facility. Appendix C provides an example of the minimum visibility requirements for new connections, which includes operational information regarding the equipment behind the Connection Point. However, it is not clear what specific signals or extent of visibility requirements are necessary for CPC connections. The impact of these facilities on the larger network is expected to be minimal, and therefore, the added expense of providing all the signals mentioned for visibility in Appendix B and C appear to be not reasonable nor aligned with the Network Security objective.

Possible approach: The Procedure needs to provide a clear definition of the expectations for CPC facilities, including the level of information that they should provide. This should be explicitly stated, indicating whether these facilities are only expected to provide the requisite basic requirements such as the breaker status and synchronization process at the Connection Point. It should also be noted that granular details regarding the breaker status for individual generators may not be necessary as the facility operates as a single unit, with minimum or no power export to the grid.

¹ [Interim-Visibility-List-Procedure.pdf \(pilbaraisoco.com.au\)](http://Interim-Visibility-List-Procedure.pdf(pilbaraisoco.com.au))

Additionally, the Procedure must define the precise signals necessitated for CPC facilities. For instance, the Harmonised Technical Rules prescribe the mandatory signals that must be included for compliance, such as the active power and active power ramp rates. Furthermore, this information can be sourced from the Network Service Provider's Power Quality meter at the Connection Point. The Procedure should stipulate that the ISO reserves the right to request only mandatory requirements, which may include ramp up, ramp down, disconnection, or reconnection of the CPC facility.

4 Negotiation Process

Issue: The Procedure outlines a Visibility List Change Proposal Template, which is used to request the addition or removal of a visibility item. However, the document lacks specific details on the timeframe required for negotiations and the parties involved in the process.

Possible approach: A possible approach could be for the Procedure to align with the Rules and specify how negotiations will be managed, detailing the steps that the ISO and NSP will undertake after receiving a negotiation request. Additionally, there is a need to provide indicative timeframe linked to these steps.

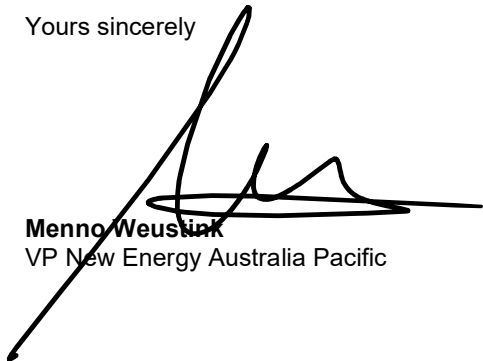
5 Conclusion

In conclusion, the Interim Visibility List Procedure is an essential component of the Rules, providing critical information to the ISO Control Desk. Woodside has sought to highlight areas where further clarity is required to ensure the effective implementation and modification of the Visibility List.

The Procedure should be amended to specify the signals required for CPC facilities and the negotiation process associated with change. By implementing these changes, the Procedure will support achievement of the System Security Objective, provide greater transparency while maintaining confidentiality and provide clarity with respect to key aspects of the Procedure.

Should you wish to discuss the matters raised in this submission, please do not hesitate to contact me.

Yours sincerely



Menno Weustink
VP New Energy Australia Pacific