



Economic Regulation Authority

Draft decision on proposed revisions to the access arrangement for the Western Power Network 2022/23 – 2026/27

Attachment 8: Services

9 September 2022

D250954

Economic Regulation Authority

Level 4, Albert Facey House

469 Wellington Street, Perth WA 6000

Telephone 08 6557 7900

Email info@erawa.com.au

Website www.erawa.com.au

This document can also be made available in alternative formats on request.

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Note

This attachment forms part of the ERA's draft decision on proposed revisions to the access arrangement for the Western Power Network for the fifth access arrangement period (AA5). It should be read with all other parts of the draft decision.

The draft decision comprises all of the following attachments:

Draft decision on proposed revisions to the access arrangement for the Western Power network 2022/23 – 2026/27 – Decision Overview

Attachment 1 – Price control and target revenue

Attachment 2 – Regulated asset base

Attachment 3A – AA4 capital expenditure

Attachment 3B – AA5 capital expenditure

Attachment 4 – Depreciation

Attachment 5 – Return on regulated asset base

Attachment 6 – Operating expenditure

Attachment 7 – Other components of target revenue

Attachment 8 – Services (this document)

Attachment 9 – Service standard benchmarks and adjustment mechanism

Attachment 10 – Expenditure incentives and other adjustment mechanisms

Attachment 11 – Network tariffs

Attachment 12 – Policies and contracts

1. Summary

This attachment deals with covered services.¹ The Access Code uses the expression “covered service” to describe what is sometimes called a “regulated service”.

An access arrangement applies to covered services. A covered service is defined in section 1.3 of the Access Code as a service provided by means of a covered network including:²

- A connection service.
- An entry service.
- An exit service.
- A bidirectional service.
- A network use of system service.
- A common service.
- A service ancillary to any of the above services.

Western Power must use all reasonable endeavours to accommodate an applicant's requirements to obtain covered services and requirements in connection with the negotiation of an access contract.

Covered services can be subdivided into reference services and non-reference services:

Reference services are services specified in an access arrangement with a reference tariff, a standard access contract and service standard benchmarks. An access arrangement must specify at least one reference service and specify a reference service for each covered service that is likely to be sought by a significant number of network services customers or a substantial proportion of the network services market.³

Non-reference services are negotiated services. The Access Code's central emphasis is on negotiated outcomes. Western Power and existing customers or new applicants may negotiate an access contract for access to any service (including a service which differs from a reference service) on any terms (including terms which differ from a standard access contract).

The Access Code also provides for a covered service to be determined an “excluded service” by the ERA if it meets the following criteria:

- The supply of that service is subject to effective competition.
- The cost of the service can be excluded from consideration for price control purposes without departing from the Code objective.

¹ This attachment focusses on the services offered. The structure and pricing of services is considered under network tariffs (Attachment 11).

² In Western Power's case, the covered network is the portions of the South West Interconnected System that are owned by Western Power. Under section 3.34A of the Access Code, a stand-alone power system provided by a service provider is treated as part of the covered network to which it is an adjunct if it replaces part of the covered network or is required to be provided by the service provider pursuant to a written law or statutory instrument.

³ The Access Code defines “customer” as a “user” or “end-use customer” in the end-use customer's capacity as an indirect customer for covered services. “User” is the person who is party to a contract for services with the service provider. “End-use customer” means a consumer (a person who consumes electricity) who obtains the benefit of covered services through a user.

Excluded services are not regulated.

An extract of the Access Code provisions relevant to reference services is included in Appendix 1.

The framework and approach document published on 9 August 2021 contains the ERA's decision on the list of reference services that Western Power was required to include in its proposed access arrangement for AA5.

On 15 October 2021, the ERA published a determination that covered services provided by batteries owned by Western Power are an excluded service.

Summary of draft decision on reference services

- The following reference services must be added to be consistent with the framework and approach document:
 - Residential and business exit and bi-directional super off-peak demand services.
- The following amendments are required to service descriptions or eligibility criteria:
 - Make clearer the storage and electric vehicle charging reference services may be used for purposes ancillary to those services.
 - Allow the low voltage storage and electric vehicle charging reference services to apply to inverter systems rated up to 3 MVA (rather than 1 MVA).
 - Allow users to choose either a five-minute or 30-minute interval data service.
 - Amend the remote load/inverter control service so that the activated device has its capability enabled for variable or binary control and allows the user to request variable or binary control.
 - Amend the business energy-based reference services so they are available to high voltage connected customers rather than only low voltage connected customers.
 - Amend the streetlighting reference service so that it is clear Western Power must ensure that if it replaces an existing luminaire with a different type of luminaire it must ensure that it complies with current public lighting standards.
 - Remove the requirement to comply with WEM Rules from the eligibility criteria for entry services.
 - Resolve the outstanding matters raised by users on the capacity allocation services and services facilitating distributed generation or other non-network solutions and amend the reference services accordingly.

The reasons for the ERA's determination and details of required amendments in respect of reference services are set out in this attachment.

2. Reference services

In the framework and approach document published on 9 August 2021, the ERA decided that the AA4 list of reference services should be retained for AA5 with the following modifications:

- Amend entry reference services and capacity allocation swap services to reflect the introduction of constrained access.
- Amend the time-of-use periods to reflect forecast demand patterns for AA5 as follows:
 - 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.
- Three new reference services were required for
 - transmission connected batteries
 - distribution connected batteries
 - electric vehicle charging stations.

2.1 Western Power's proposal

Western Power's proposed reference services for the AA5 period are set out in clause 2.2 of the proposed revised access arrangement.

Appendix E of the proposed revised access arrangement provides details of each reference service including a description of the service and user eligibility criteria. Western Power has

also included a reference services change summary as Attachment 6.1 to the access arrangement information.

Western Power proposes including the following new reference services for AA5:

- Low voltage distribution storage service (C18)
- High voltage distribution storage service (C19)
- Transmission storage service (C20)
- Low voltage electric vehicle charging service (C21)
- High voltage electric vehicle charging service (C22)
- Site visit to support the existing remote re-energise service (D11)
- Manual de-energise and re-energise services (D12 and D13)
- New metering services for weekly meter readings (M17, M18, M19 and M20)
- A new “super off-peak” time of use service for:
 - Residential exit and bi-directional services (A18 and C16)
 - Business exit and bi-directional services. (A19 and C17)

Western Power proposes the time-of-use services available under the current access arrangement (A3, A4, A12, A13, A14, A15, A16, A17, C3, C4, C9, C10, C11, C12, C13, C14) will continue to be available to connection points on those services immediately prior to the commencement of the revised access arrangement but will not be available for new nominations from the commencement of AA5.

Western Power proposes the following amendments to reference services available under the current access arrangement:

- The current four capacity allocation services (D2, D3, D4, D5) will be consolidated into a single capacity service (D2).
- The current two load control and limitation services (D6, D7) will be consolidated into a single service (D6).

2.2 Submissions

Submissions on reference services were received from Alinta Energy, Synergy and Change Energy. Details of the matters raised are included below in the considerations of the ERA.

2.3 Considerations of the ERA

The ERA’s considerations are set out below in the following order:

- Requirements in the Access Code in respect of reference services, including the Access Code objective.
- Western Power’s proposed new reference services against the requirements in the framework and approach document and the Access Code, including the Access Code objective.

- Western Power’s proposed amended reference services against the requirements in the framework and approach document and the Access Code, including the Access Code objective.
- Issues raised in respect of reference services identified in stakeholder submissions.

Identification of reference services required

Under section 5.2(b) of the Access Code, Western Power must specify at least one reference service and specify a reference service for each covered service that is likely to be sought by a significant number of users, end-use customers (in the end-use customer’s capacity as an indirect customer for covered services) and applicants or a substantial proportion of the market for services in the covered network.

The “users” of Western Power’s network are predominantly retailers, generators and large users with direct connections to the transmission system.

As part of the ERA's publication of the framework and approach document, public consultation was undertaken. Given the level of public consultation that has occurred to date in respect of AA5, subject to the matters set out in this section 2.3, the ERA considers Western Power's proposed list of reference services includes all services that are likely to be sought by a significant number of users.

Proposed new reference services

Storage services and electric vehicle charging services

Consistent with the framework and approach document, Western Power has included storage services and electric vehicle charging services in its proposed list of reference services:

- Low voltage distribution storage service (C18)
- High voltage distribution storage service (C19)
- Transmission storage service (C20)
- Low voltage electric vehicle charging service (C21)
- High voltage electric vehicle charging service (C22)

Synergy’s submission raised the following concerns on the proposed new reference services:

- Western Power proposed the eligibility criteria for the proposed new services would include a “sole use” limitation (for example, “the connection point will use storage works for the sole purpose of storage activity”). Synergy submitted that it requires the ability to use the services for purposes ancillary to storage and electric vehicle charging.
- Western Power proposed the eligibility criteria for the proposed new low voltage distribution storage service and low voltage electric vehicle charging service would restrict them to connections with inverter systems rated up to 1 MVA. Synergy submitted that it required the services to support inverters up to 3 MVA.

In its submission, Synergy noted it was continuing to engage with Western Power on the matters raised.

The ERA sought further information from Synergy and Western Power on the engagement between the parties. Western Power is proposing to amend its eligibility criteria in its access arrangement proposal to “the connection point will use storage works for the primary purpose

of a storage activity and may also be used for other purposes ancillary to a storage activity". The ERA understands this will address Synergy's concerns about "sole use".

Required Amendment 1

Amend the eligibility criteria for storage works and electric vehicle charging reference services as follows:

"the connection point will use [storage works/electric vehicle charging] for the primary purpose of a [storage activity/electric vehicle charging activity] and may also be used for other purposes ancillary to a [storage activity/electric vehicle charging activity]".

Western Power has not provided any evidence to support its proposal to restrict eligibility for the proposed new reference services for low voltage connected storage and electric vehicle charging services to connections with inverter systems rated up to 1 MVA. In the absence of such evidence, the ERA agrees the eligibility criteria should be modified to reflect the service Synergy is seeking.

Required Amendment 2

Amend the eligibility criteria for low voltage connected storage works and electric vehicle charging reference services as follows:

The premises have an inverter system rated up to a total of ± 3 MVA ...

Synergy submitted that it required both contract maximum demand and metered demand tariff structures for each service and that users should not be required to pay the transmission component of the reference tariff if it can be demonstrated they are not using the transmission network. Other stakeholders also raised concerns about the proposed tariffs and tariff structures for the new EV charging reference services. These matters are dealt with in Attachment 11 - Network Tariffs.

Subject to amending the eligibility criteria as set out in the required amendments above, the ERA considers the proposed new storage and electric vehicle charging reference services as proposed by Western Power are consistent with the requirements of the Access Code, the Access Code objective and the framework and approach document.

Super off-peak time of use service

Consistent with the framework and approach document, Western Power has included new "super off-peak" time-of-use services. The proposed time periods are consistent with the time periods set out in the framework and approach document:

- Super off-peak – 9am to 3pm
- Peak – 3pm to 9pm
- Shoulder – 6am to 9am and 9pm to 11pm
- Off-peak – 11pm to 6am.

Western Power has proposed the following reference services:

- Super Off-peak Energy (Residential) Exit Service (A18)
- Super Off-peak Energy (Residential) Bi-directional Service (C16)

- Super Off-peak Energy (Business) Exit Service (A19)
- Super Off-peak Energy (Business) Bi-directional Service (C17)

The current time-of-use reference services include energy-based and demand-based services.⁴ The proposed new time-of-use reference services do not include any demand-based services. Western Power states it has adopted time-of-use energy-based services rather than demand-based services because price signals based on energy usage are generally better understood by customers.⁵

In the framework and approach document, the ERA stated that the tariff structure statement will need to address how existing time-of-use periods will be transitioned to the revised time-of-use periods and that Western Power will need to ensure the tariffs for the discontinued time-of-use services are cost reflective. This is considered further in network tariffs (Attachment 11).

Western Power proposes the current time-of-use services (A3, A4, A12, A13, A14, A15, A16, A17, C3, C4, C9, C10, C11, C12, C13, C14) will continue to be available to connection points on those services immediately prior to the commencement of the revised access arrangement but will not be available for new nominations.

Synergy does not support the withdrawal of the current time-of-use reference services for new nominations without first being given visibility of the proposed new time-of-use tariffs.

Alinta Energy opposed the proposal to discontinue time-of-use demand-based services.⁶ Alinta Energy submits it has many customers that it expects will want to continue to use a time-of-use demand-based service. Alinta considers that its customers do not have difficulty understanding demand-based services.

The WA Expert Consumer Panel also considered that demand-based services should continue to be offered to residential and small business customers.⁷

As noted in Alinta Energy's submission, the framework and approach document required Western Power to retain all current reference services subject to the amendments set out in the framework and approach document. The amendments did not include removing the demand-based services.

To be consistent with the framework and approach document and as it is a service sought by users, the ERA considers the proposed revised reference services must include residential and business exit and bi-directional super off-peak demand services.

⁴ A demand-based service is based on both power demand on the network in a specific time-period (expressed in kW) and the amount of electricity used (expressed as kWh). The current reference services include six demand-based services for residential and business: 3 Part Time of Use Demand (Residential) Exit Service A14, 3 Part Time of Use Demand (Business) Exit Service A15, 3 Part Time of Use Demand (Residential) Bi-directional Service C11, 3 Part Time of Use Demand (Business) Bi-directional Service C12, Multi Part Time of Use Demand (Residential) Bi-directional Service C13 and Multi Part Time of Use Demand (Business) Bi-directional Service C14.

⁵ Western Power, *Proposed revisions to the access arrangement - Appendix F.1, Tariff Structure Statement Overview*, 1 February 2022, p. 14.

⁶ Alinta Energy submission page 6 to 7.

⁷ WA Expert Panel Submission Attachment 3 pp. 10 - 11.

Required Amendment 3

Include residential and business exit and bi-directional super off-peak demand services in the list of reference services.

Site visit to support a remote re-energise service

The framework and approach document required Western Power to clarify the eligibility criteria for the current 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.

Western Power has proposed to address this requirement by including additional details in the service description about what the customer must do to commence the flow of electricity and has proposed a new reference service – site visit to support a remote re-energise service D11 – for situations where the controller/end-use customer is not available to commence the flow of electricity.

The Australian Energy Council submitted that some of its members had not been able to use the remote de-energise and re-energise services because of issues with Western Power systems and processes. It encouraged the ERA to obtain confirmation from Western Power that it has resolved its system process issues and will be able to provide these services in AA5.

Western Power has confirmed that the proposed changes will enable it to provide remote de-energise and re-energise services. The ERA is satisfied that the proposed changes are consistent with the Access Code requirements, Access Code objective and the framework and approach document.

Manual de-energise and re-energise services

Consistent with the framework and approach document, Western Power has included manual de-energise and re-energise services in its proposed list of reference services. The ERA considers that this is also consistent with the requirements of the Access Code and the Access Code objective.

Metering services

Consistent with the framework and approach document, Western Power has added a clause to the metering reference services stating that a user may agree the date for a scheduled meter reading.

Western Power has also proposed to add new metering reference services for weekly meter readings to facilitate the change to weekly settlement.

Synergy submitted that the proposed metering reference services do not allow users to elect between five-minute or 30-minute interval data service.

Subsequent to the submission of Western Power's access arrangement proposal, Synergy and Western Power have met and reached agreement on revised drafting that addresses Synergy's concerns:

- Amend Appendix E, section E.1.3 Eligibility Criteria for Reference Service (metering) to include the following:

[Following weekly settlement commencement, if capability is enabled for the provision of five-minute interval energy data for a connection point, for a meter that is not a 5MS meter, the user may request the provision of either 30-minute interval energy data or five-minute interval energy data, for reference services \(metering\) that include the provision of interval energy data.](#)

- Add the following new definitions in Appendix E:

[“5MS meter” has the meaning given to it in the Metering Code.](#)

[“30-minute interval energy data” has the meaning given to it in the Metering Code.](#)

[“five-minute interval energy data” has the meaning given to it in the Metering Code.](#)

[“weekly settlement commencement” has the meaning given to it in the Metering Code.](#)

The ERA considers that, with these amendments, this is consistent with the requirements of the Access Code, the Access Code objective and the framework and approach document.

Required Amendment 4

Amend Appendix E to allow users to elect between a five-minute or 30-minute interval data service.

Proposed amended reference services

Capacity allocation services

Western Power's current access arrangement includes four capacity reference services:

- Capacity Allocation Swap (Nominator) (Business) Service – D2
- Capacity Allocation Swap (Nominee) (Business) Service – D3
- Capacity Allocation Same Connection Point (Nominator) (Business) Service - D4
- Capacity Allocation Same Connection Point (Nominee) (Business) Service – D5.

Consistent with the framework and approach document, Western Power proposes to combine the current four capacity swap services into a single service (Capacity Allocation Service - D2). As set out in the framework and approach document, this was intended to simplify administrative arrangements and allow the application and use of the service to be addressed under a single electricity transfer application.

Synergy submitted that Western Power's proposed amendments had not implemented the changes required by the framework and approach document. Synergy provided suggested amendments to the D2 service. Synergy noted it was continuing to engage with Western Power on this matter.

Alinta Energy considers the capacity allocation service can benefit customers and support network utilisation but requires clearer eligibility and approval criteria to improve its usability and realise its potential. The submission provided various suggestions for improvements to the proposed capacity allocation reference service and processes for obtaining the service.

Western Power has engaged with stakeholders to address the concerns raised. There are some outstanding issues to be resolved.

Required Amendment 5

Western Power must resolve the outstanding matters raised by users on the capacity allocation service and amend the reference service accordingly.

Direct load control and load limitation services

Consistent with the framework and approach document, Western Power has combined the current remote direct load control and load limitation services into a single reference service and expanded the service to include control of an inverter via the meter (Remote Load/Inverter Control Service – D6).

The Australian Energy Council considers the remote load/inverter control service is important for assisting users and customers to develop innovative arrangements to use the network more efficiently and reduce the amount of investment needed to augment the network.⁸ However, it considers the service proposed is not simple and that it is unclear what the user is paying for and what it will get. The Australian Energy Council also advises that some of its members have not been able to access this service because of issues with Western Power systems and processes.

Synergy submitted that the proposed amended reference service lacks adequate service definition in terms of what the reference service can be utilised for and how it will be implemented. Synergy noted it was continuing to engage with Western Power on this matter.

The ERA sought further information from Synergy and Western Power. Synergy and Western Power have reached agreement on revised drafting that addresses Synergy's concerns. The agreed amendments are as follows:

Service description: [A service] ... to send a command to an activated device for the [variable or binary](#) control of a load or inverter at a connection point from a remote locality.

Eligibility criteria: [The activated device has capability enabled for the variable or binary control of electricity transferred through the connection point.](#)

The ERA agrees the proposed amendments provide greater clarity and the amendments are consistent with the requirements of the Access Code, the Access Code objective and the framework and approach document.

⁸ Australian Energy Council submission p. 7.

Required Amendment 6

Amend the service description and eligibility criteria for Remote Load/Inverter Control Service D6 as follows:

Service description: [A service] ... to send a command to an activated device for the variable or binary control of a load or inverter at a connection point from a remote locality.

Eligibility criteria: The activated device has capability enabled for the variable or binary control of electricity transferred through the connection point.

Business energy-based services

The current reference services for high voltage network connections are demand-based. While this is generally the type of service likely to be sought by large customers connected to the high voltage network, the ERA considers the ability to access an energy consumption-based service if a site becomes vacant or there is a temporary drop in demand would better assist users to manage energy costs and, therefore, a service likely to be sought by users.

The current business energy-based reference services are restricted to customers on the low voltage network. For example, the Anytime Energy (Business) Exit Service A2 includes the following:

Reference Service Description: An exit 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.

Eligibility Criteria: Users are eligible to use this service if:

1. The exit point is located at non-residential premises; and
2. The maximum demand at the exit point is:
 - a. Less than 1,500 kVA based on historic metering data; or
 - b. Western Power determines, as a reasonable and prudent person, that the user's forecast maximum demand will be less than 1,500 kVA;

The framework and approach document required Western Power to amend the current business energy-based reference services to allow high voltage end-use customers to access them.

Western Power has proposed to amend the service description and eligibility criteria for the Anytime Energy (Business) Exit Service A2 to the following:

Reference Service Description: An exit 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 or on the high voltage (6.6 kV or higher) distribution system.

Eligibility Criteria: Users are eligible to use this service if:

1. The exit point is located at non-residential premises; and
2. One of the following applies:
 - a. It is a low voltage connection point and the maximum demand at the exit point is less than 1,500 kVA based on historic metering data; or
 - b. It is a low voltage connection point and Western Power determines as a reasonable and prudent person that the user's forecast maximum demand will be less than 1,500 kVA; or

- c. [It is a high voltage \(6.6kV or higher\) connection point with throughput equal to zero for a period of greater than 12 months.](#)

Alinta Energy considered the proposed amendments were not consistent with the framework and approach document because:

- They only allow high voltage customers to access one business energy-based reference service and not the remaining energy-based services including the time of use services.
- The proposed eligibility criteria only allow high voltage customers to access these services where they have had “throughput equal to zero for a period of greater than 12 months.”⁹

Synergy submitted that the proposed amendments to the eligibility criteria would limit (or prevent) customers from using the service in situations where their sites are temporarily vacant or are in care and maintenance.

The framework and approach document required Western Power to amend all of the business energy-based reference services to allow high voltage end-use customers to access them. The ERA considers this can be achieved by amending the service description for each relevant service as follows:

An [x] 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.

Required Amendment 7

Amend the service description for all business energy-based reference services as follows:

An [x] 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.

Introduction of constrained access

To implement the new Wholesale Electricity Market design, section 2.4C of the Access Code was amended to require entry services to allow interruption or curtailment in either of the following circumstances:¹⁰

- Where constraints are created by other users of the Western Power network (including users that connected to the Western Power network after the date of the relevant access contract).
- In connection with the operation of security constrained economic dispatch.

The framework and approach document required Western Power to amend its current entry reference services and capacity allocation swap reference services to reflect the introduction of constrained access.

Western Power proposes to meet this requirement by:

- Adding a sentence to the Distribution Entry Service (B1) and the Transmission Entry Service (B2) stating “As from 18 September 2020 an Electricity Transfer Access

⁹ Alinta Energy submission p. 7.

¹⁰ Provided they do not affect any agreement that came into effect prior to 18 September 2020.

Contract may only be entered into on terms consistent with section 2.4C of the Access Code”.

- Removing entry services from the capacity allocation service.

The ERA considers the proposed amendments are consistent with requirements of the Access Code, the Access Code objective and the framework and approach document.

Streetlighting services

Western Power has proposed to amend the Streetlighting Exit Service (A9) to state that street lights will be maintained to the design standard that existed at the time of their installation:

Western Power will maintain the streetlighting assets to ensure that the streetlighting exit service continues to be provided to [original](#) design levels. Western Power will:

....

- Replace or repair the lamps and luminaires where upon investigation the lumen output no longer meets [original minimum](#) design levels.

Western Power states that this change confirms 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.

WALGA submits that this proposed change does not improve clarity. It notes that Western Power’s practice over a long period has been to replace luminaires with different luminaires:¹¹

Each of these luminaires has a different design performance. The optics are different and will produce a different illumination footprint. Each replacement fitting does not perform photometrically in the same way as the original being replaced; therefore the design is being modified. It is very difficult to determine what the original design standard was, and it is not Western Power practice to measure and demonstrate that following maintenance lighting meets the original or any other Standard in terms of illuminating the desired areas (AS/NZS 1158) and avoiding spill lighting (AS/NZS 4282 – Control of the obtrusive effects of outdoor lighting).

Western Power refers complaints from the public regarding over-lighting and under-lighting to the Local Government, despite the fact that the Local Government has no control over changes to the lighting as a result of installing different luminaires or globes, or assurance that the design performance meets the original design or current standards. The proposed change to the Reference Service definition makes it even more difficult to assess whether the service standard has been delivered.

WALGA notes that the 20-watt LED standard replacement for an 80-watt mercury vapour luminaire does not deliver the same lighting performance. WALGA considers it is unlikely to meet the current public lighting standards (AS/NZS 1158).

WALGA considers the reference service should be amended to provide clear accountability for the performance of the lighting with reference to AS/NZS 1158 and AS/NZS 4282.

The ERA considers Western Power’s proposed amendment would be reasonable if replacements were like-for-like. However, as identified by WALGA, frequently luminaires are replaced with different luminaires. This is becoming increasingly common due to Western Power’s strategy to proactively convert all mercury vapour luminaires to LEDs by 2030. In

¹¹ WALGA submission pp. 5 – 7.

cases where Western Power initiates a change in the type of luminaire, the ERA agrees it should be required to ensure that the new luminaire meets current public lighting standards.

Required Amendment 8

The Streetlighting Exit Service (A9) must be amended as follows:

Western Power will maintain the streetlighting assets to ensure that the streetlighting exit service continues to be provided to original design levels. If Western Power initiates a change in the type of luminaire installed in an existing asset, it must ensure the streetlight asset meets current public lighting standards (AS/NZS 1158).

...

- Replace or repair the lamps and luminaires where upon investigation the lumen output no longer meets the original minimum design levels. If Western Power replaces the luminaire with a different type of luminaire, it must ensure it meets current public lighting standards (AS/NZS 1158).

Other matters raised in submissions

Requirement to comply with WEM Rules

Western Power proposed to add a new eligibility criteria to the distribution entry service (B1), transmission entry service (B2) and capacity allocation swap service (D2):

The generator's facilities and equipment comply with the Technical Rules, [the WEM Rules](#), the WA Electrical Requirements and AS/NZS 3000;

...

The provision of the service does not result in the user/s, Western Power, system management or the market operator being unable to comply with their obligations under the [WEM Rules](#);

Synergy submitted that requiring users to demonstrate to Western Power compliance to all aspects of the WEM Rules requirement would create regulatory duplication and uncertainty. As noted in its submission, the WEM Rules include a compliance regime.

In response to Synergy's submission, Western Power has agreed to remove the words "the WEM Rules" from the eligibility criteria for reference services B1, B2 and D2. The ERA considers that if this requirement is removed it will be consistent with the requirements of the Access Code, the Access Code objective and the framework and approach document.

Required Amendment 9

Remove the words "the WEM Rules" from the eligibility criteria for reference services B1, B2 and D2.

Services facilitating distributed generation or other non-network solutions

The current list of reference services and Western Power's proposed list of reference services includes two services that are intended to facilitate distributed generation or other non-network solutions:

- Entry service facilitating a distributed generation or other non-network solution – B3

- Bi-directional service facilitating a distributed generation or other non-network solution - C15.

The Australian Energy Council considers these services have the potential to provide significant benefit to incentivise users and customers to develop innovative energy solutions, use the network more efficiently and reduce capital expenditure.¹² It notes some members have not been able to use these services and are concerned they will not be used in AA5. It encourages the ERA to consider how these services can be designed so that they are simple and clear for users to apply for and receive the benefits of private investment on the network.

Synergy also submitted that amendments are required to these reference services.

Western Power has engaged with stakeholders to address the concerns raised. There are some outstanding issues to be resolved.

Required Amendment 10

Western Power must resolve the outstanding matters raised by users on the services facilitating distributed generation or other non-network solutions and amend the reference services accordingly.

¹² Australian Energy Council submission p. 7.

3. Non-reference services

As set out in Western Power's proposed access arrangement information, if a customer requests an access service that is not a reference service, Western Power will work with the customer to develop a customised product as a non-reference service. Western Power provides the following examples:

- Processing and administration fees associated with an application for network access as detailed in the applications and queuing policy.
- Network access services with conditions that vary from reference services, including:
 - transmission connected customers that have agreed to accept an interruptible service to avoid paying prohibitive deep connection costs that would otherwise be required to provide a standard service
 - customers with additional network redundancy or back-up supply available have paid for increased security and reliability for their connection
 - connections for which the customer's equipment does not meet the Technical Rules, but for which Western Power has sought an exemption from the ERA.

The specifics of the non-reference services and corresponding tariffs provided by Western Power are to be negotiated with the customer following a request for a non-reference service.

The ERA does not consider that this is contentious. The Access Code does not require a service provider to include in an access arrangement a designation or description of non-reference services or a standard access contract for non-reference services.

The ERA also notes that disputes between Western Power and applicants (and users) in respect of access and the provision of services from Western Power are dealt with in Chapter 10 of the Access Code which provides for dispute resolution procedures if the parties cannot agree a service.

If a significant number of users seek a particular network access service not currently offered as a reference service then, under section 5.2(b) of the Access Code, consideration would need to be given for such services to be included as reference services.

Appendix 1 Code Extract – Services

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 *applicants*; or
 - (ii) a substantial proportion of the market for *services* in the covered network;
 and
- (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* – 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*.

The following definitions included in the Access Code are relevant to understanding the reference services in the access arrangement:

“**covered service**” means a *service* provided by means of a *covered network*, including:

- (a) a connection service; or
- (b) an *entry service*, *exit service* or *bidirectional service*; or
- (c) a network use of system service; or
- (d) a *common service*; or
- (e) a *service* ancillary to a *service* listed in paragraphs (a) to (d) above,

but does not include an *excluded service*.

{Note: This Code uses the expression *covered service* to describe what is sometimes called a “regulated service”. It can be distinguished from an *excluded service*.

Covered services subdivide into reference services and non-reference services.}

“**services**” has the meaning given to that term in Part 8 of the Act, and “service” has a corresponding meaning.

The Act is the *Electricity Industry Act 2004* (WA), and at the time of this draft determination, the definition of “service” in Part 8 is as follows:

- (a) the transport of electricity and other services, provided by means of network infrastructure facilities; and
- (b) services ancillary to those services.

“**network**” has the meaning given to “network infrastructure facilities” in the Act.

At the time of this decision, the definition of "network infrastructure facilities" in the Act is as follows:

- (a) means electricity infrastructure used, or to be used, for the purpose of transporting electricity from generators of electricity to other electricity infrastructure or to end users of electricity; and
- (b) includes stand-alone power systems, or storage works, used, or to be used, as an adjunct to electricity infrastructure;

Other definitions in the Access Code relevant to reference services include:

“connection service” means the right to connect *facilities and equipment* at a *connection point*.¹³

{Note: A *connection service* is the right to physically connect to the network, and will regulate technical compliance etc. It is not the same thing as an *entry service* or *exit service*, which are the right to transfer electricity.}

“entry service” means a *covered service* provided by a *service provider* at an *entry point* under which the *user* may transfer electricity into the *network* at the *entry point*.

“exit service” means a *covered service* provided by a *service provider* at an *exit point* under which the *user* may transfer electricity out of the *network* at the *exit point*.

“bidirectional service” means a *covered service* provided by a *service provider* at a *bidirectional point* under which the *user* may transfer electricity into and out of the *network* at the *bidirectional point*.

“common service” means a *covered service* that is ancillary to the provision of one or more of *entry services*, *exit services* and network use of system services that ensures the reliability of a *network* or otherwise provides benefits to *users* of the *network*, the costs of which cannot reasonably be allocated to one or more particular *users* and so needs to be allocated across all *users*.

“excluded service” means a *service* provided by means of a *covered network*, including:

- (a) a *connection service*; or
- (b) an *entry service*, *exit service* or *bidirectional service*; or
- (c) a network use of system service; or
- (d) a *common service*; or
- (e) a service ancillary to the *services* listed in paragraphs (a) to (d) above,

which meets the following criteria:

- (f) the supply of the *service* is subject to effective competition, and
- (g) the cost of the *service* is able to be excluded from consideration for *price control* purposes without departing from the *Code objective*.

“reference service” means a *covered service* provided to a *user* and designated as a *reference service* in an *access arrangement* under section 5.1(a) for which there is a *reference tariff*, a *standard access contract* and *service standard benchmarks*.

“non-reference service” means a *covered service* that is not a *reference service*.

“reference tariff” means the *tariff* specified in a *price list* for a *reference service*.

“applicant” means –

¹³ As defined in section 1.3 of the Access Code, “facilities and equipment” in relation to a *connection point*, means the apparatus, equipment, plant and buildings used for or in connection with *generating*, *consuming* and *transporting* electricity at the *connection point*.

(a) a person (who may be a *user*) who has lodged an *access application* under the *access arrangement* for a *covered network* to establish or modify a *contract for services*, and includes a prospective *applicant*; and

(b) a *prior applicant*.

“**user**” means a person, including a generator or a *consumer*, who is party to a *contract for services* with a *service provider*, and under section 13.4(e) includes an *other business* as a party to a *deemed access contract*.¹⁴

“**customer**” means a:

(a) *user*; or

(b) *end-use customer* in the *end-use customer’s* capacity as indirect customer for *covered services*.

“**end-use customer**” means a *consumer* who obtains the benefit of *covered services* through a *user*.

“**consumer**” means a person who consumes electricity.

{Note: A *consumer* may also be a *user*, if it acquires a *covered service* from a *service provider*.}

¹⁴ Section 13.4(e) relates to ringfencing requirements and only applies to integrated service providers. Western Power is not an integrated service provider.