

Our ref: EDM 64833168
Contact: Sabina Roshan

1 September 2023

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

Submitted via electronic lodgement to info@era.com.au

Dear Elizabeth

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

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

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

To ensure the Technical Rules remain relevant and contemporary to industry and facilitate changes required by the reforms led by the State Government, Western Power submitted to the ERA the proposal for amendments to the Technical Rules in July 2021.

In 2022, Western Power withdrew the submission due to the proposal of a new policy position, namely the Energy and Governance Legislation project (Project EAGLE); and as some of the elements proposed within the Technical Rules pre-empted legislative and regulatory changes, for example, did not align with the Voltage and Frequency limits prescribed in the *Electricity Act 1945*.

While Western Power awaits the approval of legislation for Project EAGLE and its implementation, it believes it is critical to provide:

- clarity to user connections
- alignment with the amended Wholesale Electricity Market Rules
- update power system performance standards for network and system performance.

Therefore, Western Power has made further revisions to the 2021 proposed Technical Rules, including removing elements that were not in alignment with *the Electricity Act 1945*.



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Western Power has also created a supporting document for Users and the ERA, that captures the reasoning for the proposed changes and a draft guideline for the newly proposed Transmission Planning Criteria.

Attached with this letter are electronic copies of:

- Attachment 1: Technical Rules review submission report. This document provides the justifications for the proposed changes.
- Attachment 2: A clean version of the proposed Technical Rules
- Attachment 3: A marked-up version showing changes against the current Technical Rules
- Attachment 4: A draft copy of the proposed Transmission Planning Criteria guideline

Western Power welcomes the opportunity to discuss any aspect of the submission, please contact Sabina Roshan at sabina.roshan@westernpower.com.au.

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

Yours sincerely

Zahra Jabiri

Head of Regulation and Investment Assurance

Cc: Jacqui Hall, Chief Financial Officer