



Minutes

Meeting Title:	Power System Security and Reliability Standards Working Group (PSSRSWG)
Date:	31 October 2024
Time:	11:00am – 12:35pm
Location:	Online, via TEAMS

Attendees	Company	Comment
Dora Guzeleva	Chair, Energy Policy WA (EPWA)	
Mena Gilchrist	Australian Energy Market Operator (AEMO)	Left at 12.30pm
Toby Price	AEMO	Joined at 11.49am
Jean Mileto	Alinta Energy	Proxy for Hugh Ridgway
Elizabeth Walters	Economic Regulation Authority (ERA)	
Bronwyn Gunn	EPWA	
Sanna Pember	EPWA	
Luke Skinner	Expert Consumer Panel	
Geoff Glazier	Mott MacDonald	
Genevieve Teo	Synergy	Proxy for Rhiannon Bedola
Sabina Roshan	Western Power	
Apologies	Company	Comment
Noel Schubert	Expert Consumer Panel	
Patrick Peake	Perth Energy	
Tessa Liddelow	Shell Energy	
Daniel Cassidy	Western Power	

1. WELCOME

The Chair opened the meeting with an Acknowledgement of Country and welcomed members. The Chair noted the Competition and Consumer Law obligations circulated with the meeting agenda.

2. MEETING APOLOGIES AND ATTENDANCE

The Chair noted the apologies and attendance as listed above.

3. ACTION ITEMS

(a) Network reliability improvements

The Chair noted that:

- Mr Schubert raised a matter in the 25 July PSSRSWG meeting regarding using outage data as a key indicator for prioritising the resolution of issues causing outages.
- The question raised was what could be included in the new standards to adequately incentivise Western Power to adopt more of the practical solutions that are available with a positive cost-benefit outcome for society and customers.
- Mr Schubert has provided additional commentary on this (not yet shared with the PSSRSWG). Some of the proposed opportunities to improve reliability are design and operational in nature, and therefore out of scope for this review.
- EPWA will take Mr Schubert's input and proposal in future considerations.

Ms Gunn noted that Mr Schubert's commentary can be shared with the PSSRSWG.

(b) PSSR related issues in the Western Power Technical Rules submission to the ERA

The Chair noted that:

- At the last PSSRSWG meeting, members were asked to provide any additional input on this item.
- EPWA's approach remains unchanged: the plan is to consult on Western Power's proposed approach on some of the issues, with updated proposals on some of the issues through the Consultation Paper.
- Ms Gilchrist noted that AEMO provided some additional commentary on the Technical Rules issue list.

Ms Gunn clarified that the proposals will be carried forward for consultation, but additional notes will be included to prompt further consideration in submissions on matters for which AEMO has concerns.

4. STAGE 3 - DESIGN PROPOSALS

The Chair noted that:

- the purpose of today's session is to go through the reminder of the policy proposals.
- today's meeting is the last one before the draft Consultation Paper will be presented to the Market Advisory Committee (MAC) at its 28 November 2024 meeting.
- as per the usual Working Groups' practice, the draft paper will be available to the PSSRSWG at the same time it is circulated to the MAC.

Ms Pember presented slide 2 (Purpose of today's session).

Proposed User Facility Standards Framework

Ms Pember presented slide 4 (User Facility Standards Framework) and slide 5 (Current framework). She noted that:

- the current framework came into place in 2021, as part of the work of the Energy Transformation Taskforce.
- Chapter 3A of the Wholesale Electricity Market (WEM) Rules include relevant components such as a negotiating framework, Generator Performance Standards (GPS) monitoring

plan, GPS register to document all the agreed standards, a self-monitoring program and a compliance framework.

- Appendix 12 of the WEM Rules contains ideal and minimum standards, between which proponents can negotiate, and some Technical Standards have Common Requirements.
 - Facilities that meet the ideal performance standards are able to progress their connections without any negotiation.
 - If the proposed GPS is less than the Ideal Performance Standard in any area, acceptance is subject to negotiation with the Network Operator and AEMO.
 - Facilities cannot negotiate below the minimum standard.
- Ms Gilchrist clarified that the "minimum" does not set the minimum standard for PSSR. She added that there are many instances where AEMO may not accept the minimum, such as for locational reasons. Instead, the minimum serves as the lower threshold for negotiation.

Ms Gunn acknowledged the clarification and noted that this is EPWA's understanding as well.

Ms Pember presented slide 6 (Overview of proposed framework).

Ms Gunn presented slide 7 (Proposed categorisation) noting that:

- EPWA's proposed framework for the new Electricity System and Market Rules (ESMR) is based on the four categories listed in the slide, though the titles of these categories may be subject to change.
- The second box in the second row should state "Medium Energy Producing Systems" (not "Small Energy Producing Systems).
- The slides have been updated slightly since they were circulated to the PSSRSWG, with changes highlighted in red for transparency.
- EPWA previously planned to leave the standards for Low Voltage (LV) connected facilities to be dealt with under the Distributed Energy Resources (DER) Work Stream. However, after reviewing how these standards might fit into an integrated framework, recent discussions with the DER team showed alignment in the approach and, therefore, EPWA now proposes to include them in the PSSR Standards Review.
 - EPWA has not yet reviewed the standards with Western Power and AEMO, who contributed significantly to this work, to confirm readiness for their inclusion in the draft consultation paper.
- Ms Walters asked whether the LV proposal could contain some potentially contentious elements.

Ms Gunn explained that the approach outlined in the upcoming slides is largely a "lift and shift" of the existing framework, with a few changes as per the 2023 Technical Rules submission to the Economic Regulation Authority (ERA).

Ms Gunn presented slide 8 (User Standards – Energy Producing Systems (EPS)) and noted that this table (and tables in upcoming slides) illustrates how the standards would apply across the different proposed categories.

She noted that that the crosses for the Large Technical Users Standard indicate which parts of Appendix 12 would apply, noting that sections 12.2 and 12.5 do not apply to synchronous condensers, as they do not produce active power.

- Mr Skinner agreed with the proposed approach.

Ms Gunn presented slide 9 (Suitability of the Appendix 12 standards). She clarified that work undertaken by Western Power won't be ready before the draft Consultation Paper is presented to the MAC, and the MAC will be informed that this will be included afterward.

Ms Gunn presented slide 10 (User Facility Standard framework for Loads (including ESR)) and clarified that the technical requirements are derived from the 2023 proposed Technical Rules, which are listed out. She noted that the governance clauses in section 3.4 of the Technical Rules are not included here.

Ms Gunn presented slide 11 (Technical Requirements for hybrid facilities).

- Ms Gilchrist inquired about how this proposal will work in relation to the recent rule change which allows for separate facilities behind a connection point.

Ms Gunn responded that compliance with the technical standards can still be assessed at the connection point, regardless of whether there is a single or multiple facilities behind it or of how the facilities are organised for wholesale market participation.

- Ms Gilchrist noted that the PSSR Standards Review Technical Working Group (TWG) discussed this issue yesterday and that Mr Price, who attended the meeting on behalf of AEMO, has not yet joined today's meeting. She added that she hasn't had a chance to receive a debrief from Mr Price and asked whether the TWG was in agreement with this proposal.

Ms Gunn responded that:

- there had been a thorough discussion on this topic in the TWG and, overall, there was a general comfort level with the approach.
- one of the primary points of debate among the group was the need to maintain access to the data behind the connection point for proactive monitoring.
- this data is valuable for early detection, as issues might begin behind the connection point without immediate non-compliance showing at the connection point itself.
- such data could prompt model updates to account for differing system behaviours under varying conditions.
- Ms Roshan agreed that the TWG reached an overall consensus that compliance with the User Technical requirement will be measured at the connection point, provided there is adequate monitoring and visibility at the facility level. This includes the ability to collect data effectively at each sub-component, along with applicable control systems. She added that there will need to be coordination between the components but for overall PSSR it is a good thing to have compliance at the connection point.
- Ms Gilchrist asked whether the current approach, which allows for some flexibility to measure compliance at a point other than the connection point if required, will be maintained.

The Chair clarified that:

- that data can be collected in the same way as for any facility with multiple technologies behind the connection point (i.e. at the component level).
- there will be requirements for measurement devices, and control systems must be present at both the connection point and critical components behind it.
- that penalties for non-compliance will only be applied at the connection point. It would be unreasonable to penalise facilities for non-compliant equipment behind the connection point if compliance can still be achieved overall.

- Ms Gilchrist expressed concern, noting that it seems that AEMO and the Network Operator are losing the flexibility to establish compliance at a point other than the connection point, even if it would make sense to do so in certain cases.

The Chair responded that if someone could provide a specific example or rationale for applying compliance enforcement to components behind the connection point, EPWA would be open to considering it. However, no such example had been presented so far by the TWG.

- Ms Gilchrist acknowledged that the topic was only discussed the previous day, and she hasn't yet had a chance to review an email from AEMO's TWG members on the matter. She added that if any concerns arise, AEMO will provide that feedback.

The Chair noted that the meeting yesterday on this topic had the technical experts from both AEMO and Western Power present.

- Ms Roshan noted the need for further consideration, particularly around relevant generation modifications. She explained that if a component of a generator is modified, compliance is typically checked at the Generator Management System (GMS) level without re-assessing the other components. However, moving forward under this proposal Western Power will also need to ensure that a facility is overall compliant at the connection point to the same level as what it was prior to the modification.
- Ms Roshan suggested that additional clarity in the drafting is needed but acknowledged that the principle of the proposal make sense.

The Chair emphasised that the core principle is to ensure the facility remains compliant at the connection point, as this is where the risk to the system would occur. She noted that it would be counterproductive to maintain the current uncertainty for participants by allowing flexibility to enforce compliance on individual components.

- Ms Roshan agreed.

The Chair added that this would also avoid scenarios where penalties or remediation efforts target individual equipment, such as loads causing oscillations or harmonics, that can be remedied behind the connection point.

- Mr Skinner agreed with the proposal.

Ms Gunn presented slide 12 – (Common Requirements) and noted that there is some overlap with Appendix 12, which occasionally references the Technical Rules. She clarified that this overlap would need to be resolved during drafting to eliminate any overlaps.

Ms Gunn presented slide 13 – (Potential structure in the ESMR) and noted that that AEMO provided this illustration how the proposed Technical Rules might be structured within the ESMR framework. She noted that, while the ESMR structure is far from finalised, this initial mapping helps visualise how existing requirements could fit into the new framework.

Ms Gunn noted that Mr Schubert, who is an apology for today, provided some written input beforehand as follows:

- Mr Schubert:
 - suggested that an overarching requirement be included in the Framework and its governance that "PSSR Standards requirements are to be no more onerous than necessary" and that those developing the requirements need to be mindful of this.
 - has been involved in the evolution of technical requirements for parallel generation with the grid from the first time that any requirements were published for small generators in WA (~1994), and a regular feature of the proposed requirements over the years has been that they were often more onerous than really necessary, and more onerous than requirements in overseas jurisdictions, often acting as a barrier to entry.

Ms Gunn noted that certain sections of Appendix 12 are being examined because practical experience indicates that some newer technologies, such as grid-forming inverters, find it difficult to meet them and these issues will be consulted on as part of the paper.

(a) Governance Framework for PSSR Standards

Ms Gunn presented slide 15 (Criteria for best practise governance).

- Ms Walters queried the last dot point “Compliance by design (i.e. avoid the need for enforcement actions)”, noting that there might still be enforcement actions.

Ms Gunn agreed and clarified that the aim is to design a system that encourages compliance through proactive measures, such as the generator monitoring plan, rather than relying on a reactive approach that waits for faults to occur before investigating.

- Mr Skinner suggested that there should be robust requirements for facilities from the outset, rather than mere suggestions. He noted that, if compliance is required up front, this will lead to better adherence to the standards.

The Chair agreed with Mr Skinner, reiterating her previous comments and emphasising that open-ended flexibility for governance bodies does not provide investors with certainty regarding their liabilities or exposure to penalties once they commission their facilities. She stressed the importance of providing clarity in advance.

Ms Gunn presented slide 16 (Energy Transformation Taskforce decision).

Mr Price joined the meeting.

- Ms Mileto noted that the conversation had previously suggested a "lift and shift" of existing responsibilities and asked whether there are any plans for the new framework to change the responsibilities of parties, particularly retailers. She inquired specifically about the compliance responsibilities retailers have for their customers who have installed distributed energy resources, including the requirement to monitor compliance and accept responsibility for that.

Ms Gunn asked Ms Mileto if she was referring to responsibilities for retailers concerning customers who install rooftop solar or other distributed energy resources.

- Ms Mileto clarified that she was more concerned about larger customers who do not have non-standard reference services, particularly those who have technical obligations that exceed the established standards. She wanted to know if retailers would be responsible for their customers' compliance with these standards.

Ms Roshan clarified that customers who have a contract with a retailer don't have a direct contract with Western Power, instead any contract and agreement on technical standards/subsequent monitoring of compliance needs to go through the retailer.

Ms Gunn clarified that there are no proposed changes to the existing relationship structure between customers, retailers, and network service providers. She noted that while discussions about a more triangular relationship had occurred in the past, particularly on the East Coast, the current linear relationship, with the retailer in the middle, will remain unchanged as part of this project.

Ms Gunn presented slide 17 (Proposed process for changing technical standards) and asked the members for feedback on this proposal. She explained that:

- the proposal outlines a streamlined rule change process for technical standards, in which the technical panel would advise the coordinator on changes to the PSSR standards.
- this would allow the process to bypass the initial consultation stage typically required in standard rule changes.

She emphasised the importance of selecting panel members carefully to ensure they possess the necessary technical understanding and to avoid conflicts of interest, noting that consumer representatives would also be included on the panel.

- Ms Gilchrist raised a question regarding whether individuals not on the Reliability and Security Advisory Panel, such as industry stakeholders or retailers, would still have access to the standard rule change process as it currently exists.

Ms Gunn clarified that under the new process, the Reliability and Security Advisory Panel would initially receive proposals instead of the Coordinator of Energy (Coordinator). This approach aligns with the Taskforce's recommendations, which state that the panel should assess amendments requested by third parties. For instance, if a third party submits a proposed change to the standard, the panel would advise the Coordinator regarding the proposal.

The Chair clarified that:

- the panel is an advisory body, not a decision-making entity.
- its functions will be similar to what clause 2.4.3B of the WEM Rules currently provides for, which is the requirement for the Coordinator to request advice from AEMO and a Network Operator when making Amending Rules which affect a technical standard.
- the panel can generate advice for necessary changes to standards or serve as a point of consultation for proposals put forth by other parties.
- details regarding how the panel will operate (under the MAC or as a standalone body), its member selection and who Chairs it, are yet to be decided.
- Ms Gilchrist expressed concerns about the challenge of finding technical experts who are not conflicted, particularly for a permanent panel, as most such experts are involved in the industry. She noted that:
 - consultants may also have conflicts at times, based on their client relationships.
 - instead of a strictly non-conflicted technical panel, it could be beneficial to have a more flexible approach under which the Coordinator could access a broader panel that includes consumer groups, Western Power, AEMO and others.
 - this broader panel could provide the Coordinator with a variety of expertise, allowing for independent verification of advice, similar to the approach used in the interim measures for the GPS.
- Ms Roshan agreed with Ms Gilchrist and suggested that the panel's scope could be expanded to include proactive work, allowing it to initiate changes to the rules themselves and explore customer appetite for changes in reliability requirements.

The Chair clarified that the panel could recommend changes on its own or assess amendments requested by third parties, as indicated by the note on the slide. She acknowledged concerns about the independence of the panel members and their potential conflicts of interest, emphasising that the panel is not a decision-making body. She clarified that the Coordinator can always seek expert advice from established panels of consultants or technical experts as needed under the current framework.

Ms Gunn clarified that the idea of having core membership and secondary members refers to the ability to call upon experts as needed.

Ms Gunn presented slide 18 (Assessing initial compliance). She emphasised that, as per the current framework, Western Power cannot approve a deviation from a standard if AEMO does not agree with it.

- Ms Gilchrist noted that, if Western Power and AEMO are not aligned on a standard requirement, it's crucial for them to discuss this internally first to ensure consistency. Her

view was that it doesn't make sense for the issue to be handed off for one party to handle alone with the proponent. Instead, this misalignment points to a potential underlying issue or misunderstanding among the engineers that should be addressed collaboratively.

Ms Gunn responded that this issue was discussed with the TWG and the conclusion from that discussion was that:

- while the same standard is being applied, it's being assessed from slightly different perspectives by each party. If both parties were assessing the standard identically, there wouldn't be a need for dual involvement.
 - there have been instances where AEMO disagreed with an assessment and having feedback passed back indirectly through Western Power proved inefficient.
 - it would be more effective for AEMO, Western Power, and the proponent to engage directly in discussions, facilitating faster resolution.
 - although Western Power holds ultimate approval authority, involving AEMO directly in conversations could streamline the process while still keeping Western Power engaged in discussions.
- Ms Gilchrist noted that AEMO has no issue with meeting alongside Western Power and the proponent, which already occurs in practice. However, she expressed concern that the process might become less efficient if additional coordination is required, suggesting that Western Power should first try to resolve any differences internally with AEMO.

Ms Gunn responded that resolving the issue between Western Power and AEMO should still be the first step, but this might not always resolve the issue. She noted that, if there are any specific examples in which involving AEMO directly might create inefficiencies, she would be open to considering them.

- Ms Roshan emphasised the importance of continuous communication between AEMO and Western Power, as it remains essential to the process. However, for the sake of time efficiency, there are instances in which it would be more practical for AEMO to speak directly with the customer and the framework does not allow Western Power to request this.
- Ms Gilchrist asked for clarification on the intent behind publishing negotiated outcomes. She questioned whether the goal was to publish the standard itself or the specific negotiated outcome, expressing uncertainty over the purpose of this approach. Referencing previous discussions, she shared her concern that publishing these outcomes would only have negative implications.

The Chair noted that market transparency has been discussed on a number of occasions. She pointed out that the situation differs from a commercial contract, i.e. a contract that involves any transfer of financial value. She emphasised the importance of transparency in these negotiations, stating that any outcomes should be made clear to all other potential proponents seeking to connect to the network. In response to Ms Gilchrist's concerns, the Chair expressed uncertainty about what negatives could arise from this transparency.

- Ms Gilchrist noted that the value depends on what is published
- If it is just the negotiated outcome that is published, this would offer little insight for other proponents.
 - Publishing specific standards that are negotiated could mislead stakeholders into believing they could achieve similar negotiated outcomes. However, different proponents have significant differences based on location/system conditions/other factors.
- She pointed out that participants are already aware of the minimum and ideal standards, which establish negotiation boundaries.

The Chair explained that after extensive discussion, it was decided to propose only one approach—either derogations or negotiated outcomes—as maintaining both would be inefficient. She emphasised that a negotiation framework must include accountability and align with market rules for transparency. Without disclosing participant names or specific facility details, publishing the negotiated standard and basic facility information would ensure equitable treatment and provide early insight for new facilities on past precedents for network connections.

- Ms Roshan expressed concern over the administrative burden that publishing negotiated standards might impose on Western Power. Under the Technical Rules derogation framework, only the specific clause of exemption was published. Now, with the User Facility Standards Framework, customers can negotiate up to 16 different requirements, requiring Western Power to detail whether each clause is at the minimum, ideal, or a negotiated level. She questioned the practicality and value of publishing such extensive information for each user.

The Chair clarified that new connection applicants would likely find value in knowing what deviations from standards have been negotiated. She emphasised that the proposal will be consulted on, and if feedback suggests that transparency in publishing these deviations offers little value, EPWA will consider not proceeding with it.

- Ms Roshan indicated that Western Power would prefer not to implement this transparency measure.
- Mr Skinner argued in favour of transparency in publishing negotiated standards, suggesting that it would provide valuable information for prospective participants. He acknowledged the concern that proponents might mistakenly expect similar outcomes but noted that people may act unreasonably in any context. Drawing on his experience in union negotiations, where all terms of agreements are made public, he highlighted that this transparency allows others in like-for-like situations to understand what is achievable.
- He emphasised that these negotiations don't involve sensitive financial data and that the insights from past outcomes help new entrants gauge their own positions. He concluded that transparency is essential, and it should be pursued unless it imposes an excessive administrative burden, which he believed may be overstated.
- Ms Walters and Ms Mileto agreed with Mr Skinner.
- Ms Roshan responded that each negotiation outcome is highly specific, depending on factors like location and facility type. She pointed out that publishing negotiated standards set a precedent, leading other participants to expect similar terms, regardless of their differing circumstances. This expectation could place AEMO and Western Power in a difficult position, as it complicates the conversation and may lead others to assume they are entitled to the same outcomes, which may not be feasible.

The Chair expressed concern that the current discussion implied that the network standard might be negotiable for every requirement, which she felt undermines the purpose of having a standard.

- Ms Gilchrist disagreed, clarifying that not all clauses allow for negotiation. She explained that location, technology, and size vary widely across facilities, and that all these factors are considered when negotiating between the minimum and ideal levels.
- Ms Gilchrist also disagreed with Mr Skinner's analogy regarding transparency in union negotiations and enterprise agreements in that context and argued that publishing all negotiated standards would lead to more protracted negotiations and tie up expert resources, adding unnecessary costs without real value, as each facility has unique parameters, rendering comparisons meaningless and potentially misleading.

- Mr Skinner disagreed and noted that there were lots of similarities between what Ms Gilchrist had just outlined regarding operational differences between facilities and the difference between workplaces in union negotiations. He argued that the principle of transparency in negotiations applies across various sectors, regardless of the differences between facilities or workplaces. He contended that, at the end of the day, it's people negotiating with other people and information provided can be read and interpreted. He added that transparency leads to more accurate proposals and facilitates agreement, and non-transparent processes often complicate negotiations and hinder successful outcomes.

The Chair confirmed that this would be consulted on, and views would be taken as to whether this is useful to proponents or not.

Mr Glazier clarified that recent derogations and exemptions he has been exposed to are not due to customers' inability to meet requirements but because a different standard was required (by Western Power) to meet overall PSSR in a part of the grid. He noted that, for new facilities, it's often easier to design them to be fully compliant rather than to negotiate exemptions, which can be a lengthy process. As a result, he believes that there will not be many negotiated positions, except if Western Power requires a facility to meet section 2 of the Technical Rules.

The Chair acknowledged Mr Glazier's point and confirmed her understanding that there likely won't be many negotiated positions, suggesting that the associated burden would therefore be minimal.

Mr Glazier added that an abundance of negotiated positions resulting from the process would indicate to governance bodies that the existing standards need reevaluation.

Ms Gunn presented slide 19 (Ongoing compliance monitoring).

- Ms Roshan clarified that Western Power would conduct reactive monitoring only in cases in which there is a direct contract with Western Power, i.e. not a contract with a retailer. As per the status quo, this means that customers who have the contract with their retailer may be non-compliant, but Western Power lacks the authority to monitor them or obtain data. She noted that doing reactive monitoring for the set of customers who have compliance monitored by their retailer would be too burdensome.

Ms Gunn acknowledged that the aspect of retailer monitoring for compliance hasn't been considered in this review, indicating that further thought may be needed on this topic.

- Ms Roshan asked what the next steps would be once a customer was found to be non-compliant and Western Power lets AEMO and the ERA know.

Ms Gunn clarified that the responsibility for compliance will remain with the ERA and that the civil penalties framework to address breaches will be consolidated into the ESMR. The option to disconnect or constrain a facility if it poses a risk to PSSR would be retained. The ERA's processes once it receives notification of a breach are not within the scope for this project.

- Ms Gilchrist noted that the definition of material non-compliances would need to be defined somewhere.

Ms Gunn presented slide 20 – (Dispute resolution).

Ms Gunn presented slide 21 – (Summary – Overarching proposed Governance Framework).

Ms Gunn noted that while Ms Gilchrist had to leave the meeting, Mr Price had joined, and she invited him to comment on the earlier discussion about hybrid facility connection standards and the concerns of AEMO.

- Mr Price responded that feedback will be provided in writing, given recent discussions in the TWG and the need to consolidate input from AEMO.
- Ms Roshan also noted that Western Power will provide any consolidated feedback in writing.

The Chair noted that there was general agreement in the working group and emphasised the importance of getting feedback on this proposal as soon as possible. She noted that if anyone's position has changed since the last TWG discussion, another meeting might be necessary to address this. She noted that the point of compliance is fundamental to where the standard applies and, given that there will be different configurations of facilities connecting to the system in the future, the policy position on this needs to be clear.

Ms Gunn noted that feedback should differentiate between fatal errors in the policy position, or just disadvantages that should be subject to scrutiny through consultation.

Action Item: AEMO and Western Power to provide final written input on the proposal on assessing compliance with standards at the connection point.

5. GENERAL BUSINESS

No general business was discussed.

6. NEXT STEPS

Ms Gunn noted that the next steps involve presenting the draft Consultation Paper at the final MAC meeting of the year on 28 November 2024. Following this, input from Western Power on some of the standards in Appendix 12 is expected by the first week of December. After receiving this input, the paper will be finalised and published.

➤ Ms Gilchrist asked for clarity on the consultation timeframe for the Paper.

The Chair clarified that while the consultation period is not finalised, it will likely extend until late February to account for the holiday season. She also explained that Western Power's input will specifically address grid-forming inverters, as the current standards may not fully accommodate these technologies. She noted that changes had recently been made to the National Electricity Rules to accommodate grid forming inverters.

The meeting closed at 12:35pm.