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Dear James

### Interim Protocol Framework Procedure

APA appreciates the opportunity to provide feedback on the Pilbara ISOCo's Interim Protocol Framework Procedure (the Procedure) for the North West Interconnected System.

Please see:

- Appendix 1 for APA's more substantive issues and recommended solutions; and
- Appendix 2 for APA's minor and typographical issues and recommended solutions.

Thank you for your consideration of APA's submission. If you would like to discuss this submission, please contact me at [anthony.ravi@apa.com.au](mailto:anthony.ravi@apa.com.au) or on 0402 069 906 or [steven.kane@apa.com.au](mailto:steven.kane@apa.com.au) or 0410 443 434.

Yours sincerely

**Anthony Ravi**  
Head of Commercial

## Appendix 1: Interim Protocol Framework Procedure substantive issues and recommended solutions

Reference	Issue and Alinta DEWAP's Recommendation
<p><b>1. Register of contact information to be maintained on the ISO website [clauses 3.1.1 &amp; 3.1.2]</b></p>	<p><u>Issue</u>            The Procedure requires the ISO to collect, maintain and distribute a register of contact information for the Operator Group and the Registered NSP Group. The Procedure is not clear on where this contact information will be maintained and what contact information will be needed.</p> <p>The Procedure requires to ISO to provide a simple proforma email to ensure an adequate level of detail and uniformity to describe the activation of a Protocol. The current Procedure provides no details or template email for Registered NSP's to review.</p> <p><u>Recommendation</u>            APA recommends that the register of contact information for the Operator Group and the Registered NSP Group is maintained on the ISO website so the ISO Control Desk, Registered NSP's and Registered Controllers all have access to this information.</p> <p>APA recommends the ISO provide a template email as an Appendix to this Procedure that will be sent to Registered NSP's to describe the activation of a Protocol.</p>
<p><b>2. Process if APA believes a decision made by the ISO Control Desk is unfair or discriminatory [clause 3.2.4]</b></p>	<p><u>Issue</u>            The Procedure requires the ISO Control Desk, when making decisions including issuing directions, to not unfairly discriminate in favour of itself or against any such competitor or other person. The Procedure does not outline the process to be followed if a Registered NSP or other person believes a decision made by the ISO Control Desk is unfair or discriminatory.</p> <p><u>Recommendation</u>            APA recommends the ISO outlines the process to be followed if a Registered NSP or other person believes a decision made by the ISO Control Desk is unfair or discriminatory. APA recommends this process should be linked to the Rules.</p>
<p><b>3. Communication details between the Incident Coordinator, Registered NSPs and Registered Controllers [clause 4.2.4]</b></p>	<p><u>Issue</u>            The Procedure outlines that communication between the Incident Coordinator and Registered NSPs and Registered Controllers should be achieved in the most efficient way possible. The Procedure outlines that the most direct way to communicate with be via telephone and the time and details of these conversations must be logged. The Procedure is not clear on what details of this conversation must be logged.</p> <p><u>Recommendation</u>            APA recommends the ISO provide a template document as an Appendix to this Procedure that outlines what details must be logged when communication via telephone occurs between the Incident Coordinator and Registered NSPs and Registered Controllers.</p>

<p><b>4. Generators to be reimbursed for holding additional SRESS if directed under Rule 215 [clause 4.2.7]</b></p>	<p><u>Issue</u> The Procedure outlines that Generators will not be reimbursed for holding additional spinning reserve if directed under Rule 215 of the Rules. Generators incur a cost for holding this additional spinning reserve and should be compensated for providing SRESS to the NWIS.</p> <p><u>Recommendation</u> APA recommends that the ISO introduce a mechanism in the Procedure and the Rules for Generators to be reimbursed for holding additional spinning reserve if directed under Rule 215 of the Rules.</p>
<p><b>5. Determination of the greatest security benefit by the ISO Control Desk where two or more providers have the same secondary FCESS cost [clause 4.2.9]</b></p>	<p><u>Issue</u> The Procedure outlines that where two or more providers have the same cost under clause 4.2.8 of the Procedure, the ISO Control Desk must enable the secondary FCESS provider which provides the greatest security benefit in accordance with GEIP. The Procedure is not clear on how the greatest security benefit is determined by the ISO Control Desk.</p> <p><u>Recommendation</u> APA recommends that the ISO outline in the Procedure how the greatest security benefit will be determined by the ISO Control Desk.</p>

## Appendix 2: Interim Protocol Framework Procedure minor and typographical issues and recommended solutions

Topic	Procedure Reference	Alinta DEWAP Comment
<b>Introduction</b>		
<b>Purpose and scope</b>	1.1.1	Remove reference to “interim” and “rule A4.14” in the final procedure.
	1.1.6	Amend “rule participants” to “Rule Participants”.
	1.1.7	Amend “following a contingency See Rule [87]” to “following a contingency See Rule [187]”.
	1.2.4	In Table 1: Definitions and meanings correct “GIEP” to “GEIP”.
<b>Credible Events and Constraints</b>		
<b>Credible Contingencies</b>	2.1.1	Amend “generating units” to “Generating Works” for consistency with the Act and the Rules.
	2.1.1	Amend “storage works” to “Storage Works” for consistency with the Act and the Rules.
	2.1.1	Amend “network elements” to “Network Elements” for consistency with the Act and the Rules.
	2.1.1	Amend “registered facility” to “Registered Facility” for consistency with the Act and the Rules.
<b>Non-credible Contingencies</b>	2.2	Amend “See Rule [8, 79(1)(d)]” to See Rule [8, 79(1)(d)(ii)]” for consistency with the Rules.
	2.2.1	Amend “is statistically unlikely” to “is statistically improbable”.
	2.2.2	Amend “power system” to “Power System” for consistency with the Rules.
	2.2.3	Insert “of this Procedure” drafting at the end of clause 2.2.3.
	2.2.4	Amend “non-credible” to “Non-Credible” for consistency with the Rules.
	2.2.4	Insert “of this Procedure” drafting at the end of clause 2.2.4.
	Table 3	Amend the example “Busbar” to “substation busbar”.
	Table 3	Amend the description “generating units”, “storage works”, “network elements” and ““registered facility” to “Generating Units”, “Storage Works”, “Network Elements” and ““Registered Facility” for consistency with the Act and the Rules.
	Table 3	Amend the example “two or more generating units at different generating facilities” to two or more Generating Units at different Generating Facilities”.
<b>Credible Islanding Events</b>	2.3.1	Amend “islanding event” to “Islanding Event” for consistency with the Rules.
	2.3.1	Amend “island” to “Island” for consistency with the Rules.
	2.3.1	Amend “power system” to “Power System” for consistency with the Rules.
	2.3.1	Amend “generation facility”, “transmission element” and “consumer facility” to “Generation Facility”, “Transmission Element” and “Consumer Facility” for consistency with the Rules.
	2.3.1	Amend clause 2.3.1 to read “and has temporarily lost synchronous Connection with an adjacent part of the Power System” for consistency with the Island definition in the Rules.
	2.3.2	Amend clause 2.3.2 to read “There are three Credible Islanding scenarios in the NWIS as listed in Table 4 of this Procedure”.

	Table 4	Amend the Covered Networks Island description to “The Horizon Power Coastal Network and Alinta Port Hedland Network as a combined island, as separated from Rio Tinto” for consistency with the Rules.
	Table 4	Amend the West Pilbara Island description to “The western portion of the Horizon Power Coastal Network (including the Cape Lambert Terminal) and the Rio Tinto network as a combined Island, separated from the East Pilbara Island” for consistency with the Rules.
	Table 4	Redraft the East Pilbara Island description to “The eastern portion of the Horizon Power Coastal Network (including the South Hedland Terminal) and the Alinta Port Hedland Network as a combined Island, separated from the West Pilbara Island” for consistency with the Rules.
<b>Credible Network Constraints</b>	2.4.1	Amend “credible network constraint” to “Credible Network Constraint” for consistency with the Rules.
	2.4.1	Amend “covered transmission network” to “Covered Transmission Network” for consistency with the Rules.
	2.4.4	Amend “rule participants” to “Rule Participants” for consistency with the Rules.
	2.4.4	Amend “rules” to “Rules” for consistency with the Rules.
		Amend “constraint direction” to “Constraint Direction” for consistency with the Rules.
	2.4.5	Amend “systems operations direction” to “System Operations Direction” for consistency with the Rules.
	2.4.5	Amend “pre-contingent direction” to “Pre-Contingent Direction” for consistency with the Rules.
<b>Communication Requirements</b>	3.1.1(b)	Amend “registered NSP Group” to “Registered NSP Group” for consistency with the Rules.
	3.2.1	Amend “real-time functions” to “Real-Time Functions” for consistency with the Rules.
	3.2.1(d)	Amend “Incident coordinator” to “Incident Coordinator” for consistency with the Rules.
	3.2.1(d)	Amend “protocol” to “Protocol” for consistency with the Rules.
	3.2.2(b)	Insert “when a Protocol is activated” after “Incident Coordinator” for clarity.
	3.2.3	Amend “Incident coordinator” to “Incident Coordinator” for consistency with the Rules.
<b>Operating Under Normal Conditions</b>	3.3.1	Redraft to “A Registered NSP during Normal Operating Conditions must monitor its Network in accordance with rule 185(1) of the Rules see Rule [185(1)(e)]. This includes monitoring its network to”.
	3.3.1(a)	Amend “contingency” to “Contingency” for consistency with the Rules.
	3.3.1(a)	Amend “islanding event” to “Islanding Event” for consistency with the Rules.
	3.3.1(b)	Amend “network constraint” to “Network Constraint” for consistency with the Rules.
	3.3.1(c)	Amend “pre-contingent action” to Pre-Contingent Action” for consistency with the Rules.
	3.3.1(d)	Amend “security and reliability” to “Security and Reliability” for consistency with the Rules.
	3.3.2	Insert “of this Procedure” after “under paragraph 3.3.1” for clarity.
	3.3.2	Amend “protocol framework” to “Protocol Framework” for consistency with the Rules.
	3.3.2	Insert “with a view of achieving the System Security Objective” after “in respect of this issue” for clarity.
	3.3.3	Insert “of this Procedure” after “a notification under 3.2.2” for clarity.
3.3.3	Amend “promptly” to “as soon as reasonably practicable” for clarity.	
3.3.3	Insert “as outlined in clause 3.1.1(b)” after “to the Registered NSP Group” for clarity.	

	3.3.4	Amend “registered NSP” to “Registered NSP” for consistency with the Rules.
	3.3.4	Amend “system operations directions” to “System Operations Directions” for consistency with the Rules.
	3.3.5	Amend “normal operating conditions” to “Normal Operating Conditions” for consistency with the Rules.
	3.3.5	Amend “power system” to “Power System” for consistency with the Rules.
	3.3.5	Delete “to” after “of the Rules”.
	3.3.5(a)	Amend “contingency or islanding event” to “Contingency or Islanding Event” for consistency with the Rules.
	3.3.5(b)	Amend “network constraint” to “Network Constraint” for consistency with the Rules.
	3.3.5(c)	Amend “pre-contingent action” to “Pre-Contingent Action” for consistency with the Rules.
	3.3.5(d)	Amend “security and reliability” to “security and/or reliability” for clarity.
	3.3.6	Amend “protocol framework with the registered NSPs” to “Protocol Framework with the Registered NSPs” for consistency with the Rules.
	3.3.7	Amend “promptly” to “as soon as reasonably practicable” for clarity.
	3.3.7	Insert “as outlined in clause 3.1.1(b)” after “to the Registered NSP Group” for clarity.
<b>Operating under Contingencies and Unplanned Events</b>	3.4.1	Amend “A notifiable unplanned event for a network means a contingency” to A Notifiable Unplanned Event for a Network means a Contingency” for consistency with the Rules.
	3.4.1(a)	Amend “system security objective” to “System Security Objective” for consistency with the Rules.
	3.4.1(b)	Amend “covered transmission network” to “Covered Transmission Network” for consistency with the Rules.
	3.4.1(b)	Amend “essential system services” to “Essential System Services” for consistency with the Rules.
	3.4.1(c)	Amend “a covered NSP” to “a Covered NSP” for consistency with the Rules.
	3.4.1(c)	Amend “transmission voltage” to “Transmission Voltage” consistency with the Rules.
	3.4.2	Amend “a registered NSP in whose network a notifiable unplanned event under paragraph 3.4.1 occurs, must promptly on a 24/7 basis notify other registered NSPs and the ISO control desk” to “If in a Registered NSPs Network a Notifiable Unplanned Event under paragraph 3.4.1 of this Procedure occurs, must as soon as reasonably possible on a 24/7 basis notify other Registered NSPs and the ISO control desk” for consistency with the Rules.
	3.4.3	Insert “as outlined in clause 3.1.1(b)” after “to the Registered NSP Group” for clarity.
	3.4.4	Amend “unplanned outage which will impact its ability to provide essential system services, must promptly on a 24/7 basis notify registered NSPs and the ISO control desk via email to the “registered NSP Group”” to “unplanned Outage which will impact its ability to provide Essential System Services, must as soon as reasonably possible on a 24/7 basis notify Registered NSPs and the ISO Control Desk via email to the “Registered NSP Group””.
	3.4.5	Amend “A generator who suffers an unplanned outage of any generating units which will or might credibly be a notifiable event, must promptly on a 24/7 basis notify registered NSPs and the ISO control desk via email to the “registered NSP Group”” to “A Generator who suffers an unplanned Outage of any Generating Units which will or might credibly be a notifiable event, must promptly on a 24/7 basis notify Registered NSPs and the ISO Control Desk via email to the “Registered NSP Group””.
<b>Contact Details</b>	3.5.1	Insert “under” after “disseminated”.

<b>Documentation to Enable Post-Incident Review</b>	3.6.1	Amend 3.6.1 to read “The ISO Control Desk, Registered NSPs and registered controllers are required to document communications and decision during the activation of a Protocol to assist the ISO with a post-incident review”.
	3.6.2(ii)	Amend “network” to “Network” for consistency with the Rules.
	3.6.2(ii)	Insert “and Registered NSPs” after “impact of the Network”.
	3.6.2(iii)	Amend “technical envelope and secure state” to “Technical Envelope and Secure State” for consistency with the Rules.
	3.6.2(vii)	Amend “system operations directions” to “System Operations Directions” for consistency with the Rules.
	3.6.2(b)	Amend 3.6.2(b) to read “Registered NSP on the Network where the incident occurred” for clarity.
	3.6.2(b)(ii)	Amend “network” to “Network” for consistency with the Rules.
	3.6.2(b)(iii)	Amend “technical envelope and secure state” to “Technical Envelope and Secure State” for consistency with the Rules.
	3.6.2(b)(iv)	Amend 3.6.2(b)(iv) to read “Time to rectify the incident and the duration of the incident including the number of Trading Intervals affected”.
	3.6.2(b)(v)	Amend “system operations directions” to “System Operations Directions” for consistency with the Rules.
	3.6.2(c)	Amend “other registered NSPs” to “other Registered NSPs” for consistency with the Rules.
	3.6.2(c)(ii)	Amend “technical envelope and secure state” to “Technical Envelope and Secure State” for consistency with the Rules.
	3.6.2(c)(iii)	Amend “system operations directions” to “System Operations Directions” for consistency with the Rules.
	3.6.2(d)	Amend “Registered controllers” to “Registered Controllers” for consistency with the Rules.
	3.6.2(d)(ii)	Amend “network” to “Network” for consistency with the Rules.
	3.6.2(d)(ii)	Amend “technical envelope and secure state” to “Technical Envelope and Secure State” for consistency with the Rules.
	3.6.2(d)(iii)	Amend “system operations directions” to “System Operations Directions” for consistency with the Rules.
<b>Preservation of Records</b>	3.7.1	Insert “from the date the records were created” after “for at least 7 years”.
<b>Form and Content</b>	4.1.1(a)	Amend 4.1.1(a) to read “Maintaining the Power System inside the Technical Envelope where practicable and in a secure state” for consistency with the Rules.
<b>Activation</b>	4.2.1	Amend “registered NSP” to “Registered NSP” for consistency with the Rules.
	4.2.1	Amend “protocol” to “Protocol” for consistency with the Rules.
	4.2.3	Amend “registered NSP” to “Registered NSP” for consistency with the Rules.
	4.2.3	Amend “Registered controller” to “Registered Controller” for consistency with the Rules.
	4.2.3	Delete “the” after “thereafter” for clarity.
	4.2.3(a)	Amend “incident coordinator” to “Incident Coordinator” for consistency with the Rules.
	4.2.4	Amend “incident coordinator” to “Incident Coordinator” for consistency with the Rules.
	4.2.4	Amend “registered NSPs” to “Registered NSPs” for consistency with the Rules.
	4.2.4	Amend “Registered controllers” to “Registered Controllers” for consistency with the Rules.
4.2.4	Replace “efficacious” with “efficient”.	

	4.2.5	Amend “incident coordinator” to “Incident Coordinator” for consistency with the Rules.
	4.2.5	Insert “with a view of achieving the System Security Objective” after “pre-contingent directions”.
	4.2.6	Amend “incident coordinator” to “Incident Coordinator” for consistency with the Rules.
	4.2.6	Amend “registered NSP” to “Registered NSP” for consistency with the Rules.
	4.2.6	Amend “protocol” to “Protocol” for consistency with the Rules.
	4.2.8	Amend “enablement order of merit’ to “Enablement order of merit” for consistency with the Rules.
	4.2.8	Insert “under Rule 206(5) of the Rules” after “Enablement order of merit” for clarity.
<b>Restrictions on Systems Operations Directions</b>	4.3.1	Amend “system operations directions” to “System Operations Directions” for consistency with the Rules.
	4.3.1	Amend “technical envelope and secure state” to “Technical Envelope and Secure State” for consistency with the Rules.
	4.3.1	Delete “promptly” and replace with “as soon as reasonably practicable” for consistency throughout the Procedure.
	4.3.2	Amend “integrated mining network” to “Integrated Mining Network” for consistency with the Rules.
	4.3.3	Amend “Pluto permitted direction” to “Pluto Permitted Direction” for consistency with the Rules.
	4.3.3	Amend “network user” to “Network User” for consistency with the Rules.
	4.3.3	Amend “A Pluto recipient is the controller of the Pluto facility, or a network user of Horizon Power’s network with a right to withdraw or inject electricity at the Pluto connection point” to “A Pluto Recipient is the controller of the Pluto Facility, or a Network User r of the Host Network who has a right under a Network Access Contract with the Host NSP to either (or both) Withdraw electricity from the Host Network, or Inject electricity into the Host Network, at the Pluto Connection Point” for consistency with the Rules.
	4.3.3(i)	Amend clause 4.3.3(i) to “reduce the Withdrawal of electricity from the Host Network at the Pluto Connection Point” for consistency with the Rules.
	4.3.3(ii)	Amend “disconnect the Pluto connection point from the NWIS” to “disconnect the Pluto Connection Point from the NWIS” for consistency with the Rules.
<b>Deactivation</b>	4.4.1	Amend “incident coordinator” to “Incident Coordinator” for consistency with the Rules.
	4.4.2	Amend “incident coordinator” to “Incident Coordinator” for consistency with the Rules.