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Mr James Campbell-Everden
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By submission portal

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INTENDED FOR PUBLICATION

Dear James

RE: Submission on the Interim Protocol Framework Procedure

1 Executive Summary

Woodside as a new entrant has invested significant time and resources in the Access and Connection Process to connect the proposed Maitland Solar farm generation facility to the Pluto LNG facility at the Burrup (Pluto) to enable it to import renewable energy into Pluto to supplement electricity generated from generation facilities on the Pluto site. Woodside requires a stable internal and external electricity supply to maintain its operations at Pluto. Although Woodside acknowledges that the North-West Interconnected System (NWIS) transmission system operates with a high degree of reliability and Woodside will continue to be able to meet its electricity demand from its Pluto generation facilities, situations may arise in which Pluto may elect to or may be required to disconnect from the NWIS for short periods.

In the event that Pluto (or any other facility) is disconnected from the NWIS following a voluntary or involuntary disconnection, a clearly defined process is necessary to ensure efficient reconnection of that facility to the NWIS. This is particularly important when the cause of disconnection does not originate from Pluto itself (or any other facility that is disconnected). Establishing a well-defined protocol for reconnection can help prevent unnecessary delays and complications while maintaining the operational integrity of the Pluto facility (or other facility that is disconnected), consistent with the Pilbara Electricity Objective.

2 Introduction

Woodside appreciates the opportunity to provide feedback on the Interim Protocol Framework Procedure (Procedure) which came into effect on 2 October 2023. The Procedure aims to create a framework to assist the Independent System Operator (ISO) Control Desk and Registered Network Service Providers (NSPs) in managing their collective response to maintain the Power System inside the Technical Envelope in a Secure State and to return it to inside the Technical Envelope promptly, to a Secure State as soon as practicable following an event. As a potential new entrant to the Pilbara electricity market, Woodside supports the development of this Procedure and the further clarity it provides regarding the protocol framework.

Woodside has identified certain matters which may require amendment of the Procedure to clarify certain aspects of incident investigations and the reconnection process that follows an incident. Currently the Procedure lacks clarity in terms of how incident investigations are to be conducted, as well as accountability and sharing of the investigation results. There is also ambiguity in the Procedure regarding the reconnection of a facility after a voluntary or involuntary disconnection. Woodside believes it is essential to provide clarifications and amendments to the Procedure to ensure it aligns with the Pilbara Electricity Objective of providing a secure and reliable power system for all participants.

3 Incident Investigation

As per section 3.6 - Documentation to Enable Post-Incident Review of the Procedure, if an incident occurs on the NWIS, the ISO Control Desk, Registered NSP and Registered Controllers must share information regarding the circumstances of the incident. This includes reasons for activating the Protocol, the impact of the incident, the actions taken to rectify it and bring the network back to a Secure State, the time taken to rectify the incident, and the extent of any non-compliance with system operations directions.

4 Issue

Rule 193.1.(a) states that the primary objective of Subchapter 7.6 Post-incident discussion and investigation is the continuous improvement of procedures and the operation of the power system. Rule 193.2.(c) states that the secondary objective of post-incident discussion and investigation is to maintain transparency with candour.

The Procedure does not describe when and how the ISO intends to share the incident investigation report (formal and informal) with all registered controllers and NSPs to facilitate knowledge-sharing after the completion of the investigation.

Though ISO has the powers to investigate an incident, it is unclear if there will be multiple investigation reports from other parties such as other NSPs.

A possible approach

ISO should consider updating the Procedure in line with the Pilbara Network Rules and discuss sharing post-incident investigation communication with registered controllers and NSPs for transparency, future reference, and knowledge sharing. This should also include the accountability and responsibility of each party involved in the investigation, detailed flowchart(s) highlighting the investigation process, including indicative timeframe for the initial investigation findings and the final report.

To maximise efficiency, the ISO should publish one formal or informal incident investigation report that combines the findings of all stakeholders and propose recommendations for continuous improvement. This approach would improve the security and reliability of the NWIS network for all participants and maintain transparency in the investigation process.

5 Disconnection from the NWIS and Reconnection

The Incident Coordinator, as described in the Procedure, is responsible for consulting with and requesting registered NSPs and controllers to take necessary actions to promptly return the system to a Secure State. This involves complying with Good Electricity Industry Practice (GEIP), equipment limits, security limits, and Connection Point Compliance (CPC) measures. If these actions fail, or there is not enough time to carry them out, or no suitable protocol exists, the incident coordinator must issue a System Operations Direction to a registered NSP or controller in accordance with Section 4.3 of this Procedure - to disconnect, in part or in whole, a network or facility.

Issue

The Procedure does not provide guidance on how to handle situations where disconnection from the NWIS has occurred due to breaches or non-compliance. Additionally, it does not outline the steps required for reconnecting back to the NWIS. It is also unclear whether the process for reconnecting after a voluntary disconnection is the same or different from the process for involuntary disconnection.

A possible approach

The Procedure requires an update to provide more detailed information on how to handle breaches or non-compliance identified during incident investigations. It should also outline the necessary procedures and steps involved in reconnecting to the NWIS. Additionally, it should address the cases where disconnection is voluntary by the NSP or participant.

6 Conclusion:

Overall, Woodside supports the development of the Interim Protocol Framework Procedure as a means of maintaining a secure and reliable Power System within the Technical Envelope. However, the Procedure requires clarification and amendments regarding incident investigations and the reconnection process. Woodside suggests that the ISO update the Procedure to provide more clarity and accountability in the incident investigation process and outline the necessary procedures and steps involved in reconnecting back to the NWIS. Implementing these changes would help maintain transparency, ensure the security and reliability of the NWIS network, and provide clear steps for participants to follow.

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

Yours sincerely



Menno Weustink
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