

STAKEHOLDER RESPONSES –INTERIM PROTOCOL FRAMEWORK PROCEDURE V1.1

Item	Section	Submission	Stakeholder Comment	ISO Response
1.	General	Horizon Power	<p>General comment: There is extensive duplication in the document (particularly with description of roles when various protocols are activated) which compromises its effectiveness.</p> <p>Horizon Power recommend:</p> <ol style="list-style-type: none"> 1. Having all directions available for all scenarios, which would significantly simplify the entire document and empower the incident coordinator to make appropriate directions in respect to system security and stability - it is conceivable that a number of these directions which are not highlighted as available could be relevant in discrete circumstances. 2. Removing duplication in the document to avoid confusion. 3. Remove where possible the need to cross reference the PNR for clarity - this Protocol document should reflect what practically needs to be implemented to meet the intent of the PNR. 	<p>With regard to:</p> <ol style="list-style-type: none"> 1) making all directions available for all scenarios – Rule 188(3) of the Rules outlines the permitted content of a direction. The Protocol Framework sets out the credible and non-credible contingencies and the directions that may be reasonably necessary to achieve the System Security Objective. <p>The ISO notes that the Protocol Framework has been developed generally in consensus with the NSPs, more than one protocol may be activated at any time, and that the Protocol Framework is designed to be refined and improved over time following incident investigations.</p> <ol style="list-style-type: none"> 2) Remove duplication – Rule 79 and Rule 80 sets out the content of the Protocols, each Protocol is "stand alone" and therefore when read with the other protocols includes duplication. The ISO has attempted to standardise requirements wherever possible. 3) Remove where possible the need to cross reference the PNR - The Protocol Framework is a Procedure for the purposes of the Rules and therefore has to meet the requirements of Subchapters 3.6 and 3.7 of the Rules and generally should be read in conjunction with the Rules, particularly Chapter 7 - System Operations.
2.	General	Woodside	<p>Executive Summary</p> <p>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</p>	<p>Noted</p> <p>Specific issues identified by Woodside are addressed in relevant sections below:</p> <ul style="list-style-type: none"> • Incident investigation – Item 96 and 97 • Disconnection from the NWIS and reconnection – Item 149

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			<p>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.</p> <p>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.</p> <p>Introduction</p> <p>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.</p> <p>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.</p>	

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3.	1.1	Horizon Power	References like this at the start of the section is useful, however references mid way through the sections requiring the reader to refer to the PNRs makes the document clumsy to administer - the Protocol framework document should describe in plain English what to do to meet the intent of the PNR.	The Protocol Framework Procedure and Protocols within it have legal effect. The Procedure attempts to strike the balance between what is legally and operationally required.
4.	1.1.1	APA	Remove reference to "interim" and "rule A4.14" in the final procedure.	No change refer to Rule A4.78
5.	1.1.6	APA	Amend "rule participants" to "Rule Participants".	Refer to paragraph 1.2.1
6.	1.1.7	APA	Amend "following a contingency See Rule [87]" to "following a contingency See Rule [187]".	Updated paragraph 1.1.5
7.	Table 1	Horizon Power	Add AGC and Isoch definition	Updated Table 1
8.	1.2.4	APA	In Table 1: Definitions and meanings correct "GIEP" to "GEIP".	Updated Table 1
9.	2.1.1	Horizon Power	Need to consider whether the introduction of "storage works" failure or removal from operational service should be included in this credible contingency description. It is inconsistent "contingency" definition in the PNR. That said, the PNR presents the option for defining "credible contingency" in the Protocol Framework, but would suggest it be limited to a registered "storage works" so it can be more focused on "storage works" which the ISO determine need to be registered, ie "storage works" that are material for providing system security in normal operation.	No change. Rule 92 currently exempts controllers of storage works from registering however the ISO may require controllers of storage works on covered networks to register in certain circumstances. The ISO has not developed criteria or process where controllers of storage works on covered networks would be required to register.
10.	2.1.1	APA	Amend "generating units" to "Generating Works" for consistency with the Act and the Rules.	Refer to paragraph 1.2.1
11.	2.1.1	APA	Amend "storage works" to "Storage Works" for consistency with the Act and the Rules.	Refer to paragraph 1.2.1
12.	2.1.1	APA	Amend "network elements" to "Network Elements" for consistency with the Act and the Rules.	Refer to paragraph 1.2.1

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13.	2.1.1	APA	Amend "registered facility" to "Registered Facility" for consistency with the Act and the Rules.	Refer to paragraph 1.2.1
14.	Table 2 A1	Horizon Power	Remove references to Equipment and include in that section below. Add: - Interconnector circuit - Transmission line circuit - Transformer circuit - Generator circuit	Updated Table 2, row A1
15.	Table 2 A2	Horizon Power	Not sure if we should put a more general telecommunications reference here - I am thinking of when DERMS goes live and take up is material. Add Controller (eg: PLC or generator controller)	Updated Table 2, row A2
16.	Table 2 A3	Horizon Power	Storage Works?	No change, already included
17.	Table 2 A4	Horizon Power	remove the reference to network and terminal and include reference to substation, Facility and Storage Works	Updated Table 2, row A4
18.	Table 2 A4	Horizon Power	replace "terminal device" with loss of critical Equipment - its a defined term in in the PNR ... or if it is specifically focused on voltage regulation devices, state this	No change. Terminal device and critical equipment not defined in the Rules or HTR. Wording currently aligns with AEMO's Credible Contingency Events Procedure for the WEM.
19.	2.2	APA	Amend "See Rule [8, 79(1)(d)]" to See Rule [8, 79(1)(d)(ii)]" for consistency with the Rules.	Updated Rule reference
20.	2.2.1	Horizon Power	Suggest re-wording to A non-credible contingency event is any event which under normal operating conditions is statistically very unlikely to occur and which is not considered reasonable to predict.	Updated paragraph 2.2.1
21.	2.2.1	APA	Amend "is statistically unlikely" to "is statistically improbable".	Updated paragraph 2.2.1
22.	2.2.2	APA	Amend "power system" to "Power System" for consistency with the Rules.	Refer to paragraph 1.2.1

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23.	2.2.3	APA	Insert "of this Procedure" drafting at the end of clause 2.2.3.	Updated paragraph 2.2.3
24.	2.2.4	APA	Amend "non-credible" to "Non-Credible" for consistency with the Rules.	Refer to paragraph 1.2.1
25.	2.2.4	APA	Insert "of this Procedure" drafting at the end of clause 2.2.4.	Updated paragraph 2.2.4
26.	Table 3	Horizon Power	I would include "Terrorist action, willful and or malicious damage and third party impacts (vehicle/plane).	No change to the Procedure. The description and examples refer to the elements that are lost, not the causes of the event.
27.	Table 3	APA	Amend the example "Busbar" to "substation busbar".	Updated Table 3
28.	Table 3	APA	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.	Refer to paragraph 1.2.1
29.	Table 3	APA	Amend the example "two or more generating units at different generating facilities" to two or more Generating Units at different Generating Facilities".	Refer to paragraph 1.2.1
30.	Table 3 Loss of protection scheme Description	Horizon Power	Suggest deleting "any other power"	Updated Table 3
31.	Table 3 Loss of protection scheme Examples	Horizon Power	Include other protection schemes (ie generation, storage works).	Updated Table 3
32.	Table 3 Loss of multiple network	Horizon Power	Need to discuss with RTIO and ISO on whether DMP 61 and 62 interconnectors to DBS tripping at the same time should be considered a credible contingency - my understanding is that the protection will trip both these lines under certain scenarios. If	No change. This is not currently considered a credible contingency.

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	elements or facilities		agreed I would put a foot note to include this as a credible contingency.	
33.	Table 3 Loss of multiple network elements or facilities - Examples	Horizon Power	Expand to cover "or the same facility".	Updated Table 3
34.	Table 3 Loss of multiple network elements or facilities - Examples	Horizon Power	Typo	Additional full stop removed
35.	2.3.1	APA	Amend "islanding event" to "Islanding Event" for consistency with the Rules.	Refer to paragraph 1.2.1
36.	2.3.1	APA	Amend "island" to "Island" for consistency with the Rules.	Refer to paragraph 1.2.1
37.	2.3.1	APA	Amend "power system" to "Power System" for consistency with the Rules.	Refer to paragraph 1.2.1
38.	2.3.1	APA	Amend "generation facility", "transmission element" and "consumer facility" to "Generation Facility", "Transmission Element" and "Consumer Facility" for consistency with the Rules.	Refer to paragraph 1.2.1
39.	2.3.1	APA	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.	Updated paragraph 2.3.1
40.	2.3.2	APA	Amend clause 2.3.2 to read "There are three Credible Islanding scenarios in the NWIS as listed in Table 4 of this Procedure".	Updated paragraph 2.3.2
41.	Table 4	APA	Amend the Covered Networks Island description to "The Horizon Power Coastal Network and Alinta Port Hedland Network as a	Updated Table 4

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			combined island, as separated from Rio Tinto" for consistency with the Rules.	
42.	Table 4	APA	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.	Updated Table 4
43.	Table 4	APA	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.	Updated Table 4
44.	Table 4	Horizon Power	Should add three more islanding scenarios: 1. Horizon Power West Pilbara Island 2. Horizon Power East Pilbara Island 3. Horizon Power East and West Pilbara Island	These islanding scenarios require the loss of multiple lines and are not regarded as a credible single contingency.
45.	Table 4 Note	Horizon Power	I would encourage all islands to be presented in this table.	The table only lists credible islands, as required in Rule 79 (1)(a).
46.	2.4.1	APA	Amend "credible network constraint" to "Credible Network Constraint" for consistency with the Rules.	Refer to paragraph 1.2.1
47.	2.4.1	APA	Amend "covered transmission network" to "Covered Transmission Network" for consistency with the Rules.	Refer to paragraph 1.2.1
48.	2.4.4	APA	Amend "rule participants" to "Rule Participants" for consistency with the Rules.	Updated paragraph 2.4.4
49.	2.4.4	APA	Amend "rules" to "Rules" for consistency with the Rules.	Updated paragraph 2.4.4
50.	2.4.4	APA	Amend "constraint direction" to "Constraint Direction" for consistency with the Rules.	Refer to paragraph 1.2.1
51.	2.4.5	APA	Amend "systems operations direction" to "System Operations Direction" for consistency with the Rules.	Refer to paragraph 1.2.1

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52.	2.4.5	APA	Amend "pre-contingent direction" to "Pre-Contingent Direction" for consistency with the Rules.	Refer to paragraph 1.2.1
53.	3.1.1(b)	APA	Amend "registered NSP Group" to "Registered NSP Group" for consistency with the Rules.	Refer to paragraph 1.2.1
54.	3.1.1 & 3.1.2	APA	<p>1. Register of contact information to be maintained on the ISO website</p> <p><u>Issue</u></p> <p>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. 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></p> <p>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. 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>The ISO maintains and publishes a Registration List, which provides contact details of registered NSPs, registered controllers and registered facilities.</p> <p>The ISO will consult appropriately on the Protocol activation email template prior to it being finalised. This template does not form part of the Procedure.</p>
55.	3.2.1	APA	Amend "real-time functions" to "Real-Time Functions" for consistency with the Rules.	Refer to paragraph 1.2.1
56.	3.2.1(d)	APA	Amend "Incident coordinator" to "Incident Coordinator" for consistency with the Rules.	Updated paragraph 3.2.2(b)
57.	3.2.1(d)	APA	Amend "protocol" to "Protocol" for consistency with the Rules.	Updated paragraph 3.2.1(d)
58.	3.2.2(b)	APA	Insert "when a Protocol is activated" after "Incident Coordinator" for clarity.	Updated paragraph 3.2.2(b)

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59.	3.2.3	APA	Amend "Incident coordinator" to "Incident Coordinator" for consistency with the Rules.	Updated paragraph 3.2.3
60.	3.2.4	APA	<p>2. Process if APA believes a decision made by the ISO Control Desk is unfair or discriminatory</p> <p><u>Issue</u></p> <p>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></p> <p>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>	Subchapter 7.6 of the Rules deals with post-incident discussion and investigation.
61.	3.3.1	APA	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".	Refer to paragraph 1.2.1
62.	3.3.1(a)	APA	Amend "contingency" to "Contingency" for consistency with the Rules.	Refer to paragraph 1.2.1
63.	3.3.1(a)	APA	Amend "islanding event" to "Islanding Event" for consistency with the Rules.	Refer to paragraph 1.2.1
64.	3.3.1(b)	APA	Amend "network constraint" to "Network Constraint" for consistency with the Rules.	Refer to paragraph 1.2.1
65.	3.3.1(c)	APA	Amend "pre-contingent action" to "Pre-Contingent Action" for consistency with the Rules.	Refer to paragraph 1.2.1
66.	3.3.1(d)	APA	Amend "security and reliability" to "Security and Reliability" for consistency with the Rules.	Refer to paragraph 1.2.1

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67.	3.3.2	APA	Insert "of this Procedure" after "under paragraph 3.3.1" for clarity.	Updated paragraph 3.3.2
68.	3.3.2	APA	Amend "protocol framework" to "Protocol Framework" for consistency with the Rules.	Updated paragraph 3.3.2
69.	3.3.2	APA	Insert "with a view of achieving the System Security Objective" after "in respect of this issue" for clarity.	Updated paragraph 3.3.2
70.	3.3.3	APA	Insert "of this Procedure" after "a notification under 3.2.2" for clarity.	Updated paragraph 3.3.3
71.	3.3.3	APA	Amend "promptly" to "as soon as reasonably practicable" for clarity.	The Rules refer to promptly. Promptly is defined in Rule 10 of the Rules.
72.	3.3.3	APA	Insert "as outlined in clause 3.1.1(b)" after "to the Registered NSP Group" for clarity.	Updated paragraph 3.3.3
73.	3.3.4	APA	Amend "registered NSP" to "Registered NSP" for consistency with the Rules.	Refer to paragraph 1.2.1
74.	3.3.4	APA	Amend "system operations directions" to "System Operations Directions" for consistency with the Rules.	Refer to paragraph 1.2.1
75.	3.3.5	APA	Amend "normal operating conditions" to "Normal Operating Conditions" for consistency with the Rules.	Refer to paragraph 1.2.1
76.	3.3.5	APA	Amend "power system" to "Power System" for consistency with the Rules.	Refer to paragraph 1.2.1
77.	3.3.5	APA	Delete "to" after "of the Rules".	Updated paragraph 3.3.5
78.	3.3.5(a)	APA	Amend "contingency or islanding event" to "Contingency or Islanding Event" for consistency with the Rules.	Refer to paragraph 1.2.1
79.	3.3.5(b)	APA	Amend "network constraint" to "Network Constraint" for consistency with the Rules.	Refer to paragraph 1.2.1

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80.	3.3.5(c)	APA	Amend "pre-contingent action" to Pre-Contingent Action" for consistency with the Rules.	Refer to paragraph 1.2.1
81.	3.3.5(d)	APA	Amend "security and reliability" to "security and/or reliability" for clarity.	Updated paragraph 3.3.5(d)
82.	3.3.6	APA	Amend "protocol framework with the registered NSPs"" to "Protocol Framework with the Registered NSPs" for consistency with the Rules.	Updated paragraph 3.3.6
83.	3.3.7	APA	Amend "promptly" to "as soon as reasonably practicable" for clarity.	The Rules refer to promptly. Promptly is defined in Rule 10 of the Rules.
84.	3.3.7	APA	Insert "as outlined in clause 3.1.1(b)" after "to the Registered NSP Group" for clarity.	Updated paragraph 3.3.7
85.	3.4.1	APA	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.	Refer to paragraph 1.2.1
86.	3.4.1(a)	APA	Amend "system security objective" to "System Security Objective" for consistency with the Rules.	Refer to paragraph 1.2.1
87.	3.4.1(b)	APA	Amend "covered transmission network" to "Covered Transmission Network" for consistency with the Rules.	Refer to paragraph 1.2.1
88.	3.4.1(b)	APA	Amend "essential system services" to "Essential System Services" for consistency with the Rules.	Refer to paragraph 1.2.1
89.	3.4.1(c)	APA	Amend "a covered NSP" to "a Covered NSP" for consistency with the Rules.	Refer to paragraph 1.2.1
90.	3.4.1(c)	APA	Amend "transmission voltage" to "Transmission Voltage" consistency with the Rules.	Refer to paragraph 1.2.1
91.	3.4.2	APA	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	The Rules refer to promptly. Promptly is defined in Rule 10 of the Rules.

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			soon as reasonably possible on a 24/7 basis notify other Registered NSPs and the ISO control desk" for consistency with the Rules.	
92.	3.4.3	APA	Insert "as outlined in clause 3.1.1(b)" after "to the Registered NSP Group" for clarity.	Updated paragraph 3.4.3
93.	3.4.4	APA	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"".	The Rules refer to promptly. Promptly is defined in Rule 10 of the Rules.
94.	3.4.5	APA	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"".	The Rules refer to promptly. Promptly is defined in Rule 10 of the Rules.
95.	3.5.1	APA	Insert "under" after "disseminated".	Updated paragraph 3.5.1
96.	3.6	Woodside	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.	Updated section 3.6 to include note on system coordination bulletin. Rule 288 of the Rules requires ISO to publish at least every quarter a system coordination bulletin. The bulletin is to include details of: <ul style="list-style-type: none"> (a) the incidence and extent of constraint directions issued; and (b) the incidence and extent of system operations directions and pre-contingent direction issued; and (c) the incidence and extent of non-compliances with directions; and (d) the incidence and extent of noteworthy incidents in the power system (including contingencies, pre-contingent actions, shortfalls in Essential System Services, and occasions on which the power system was not in a secure

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				<p>state or was outside the technical envelope), together with, for each such incident —</p> <ul style="list-style-type: none"> i. information about the circumstances that caused the incident; and ii. information about the actions that the ISO and registered NSPs took in response to the incident; and iii. the results of any post-incident discussion or investigation under Subchapter 7.6.
97.	3.6	Woodside	<p>Issue</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>A possible approach</p> <p>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.</p> <p>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.</p>	<p>The ISO does not have a head of power to draft a Procedure dealing with Subchapter 7.6 - post incident discussions and investigation.</p> <p>The ISO notes:</p> <ul style="list-style-type: none"> • Rule 196 outlines some general guidance for the ISO to follow in providing notes dealing with informal discussions; • Rule 197 outlines the requirement for the ISO to undertake an investigation and publish a report; and • Rule 288 outlines the information the ISO is required to publish in its system coordination bulletin, including the results of any post-incident discussion or investigation.

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98.	3.6.1	APA	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".	Refer to paragraph 1.2.1
99.	3.6.2(ii)	APA	Amend "network" to "Network" for consistency with the Rules.	Refer to paragraph 1.2.1
100.	3.6.2(ii)	APA	Insert "and Registered NSPs" after "impact of the Network".	No change. Under 3.6.2(b)(ii) registered NSPs need to provide information on impacts.
101.	3.6.2(iii)	APA	Amend "technical envelope and secure state" to "Technical Envelope and Secure State" for consistency with the Rules.	Refer to paragraph 1.2.1
102.	3.6.2(vii)	APA	Amend "system operations directions" to "System Operations Directions" for consistency with the Rules.	Refer to paragraph 1.2.1
103.	3.6.2(b)	APA	Amend 3.6.2(b) to read "Registered NSP on the Network where the incident occurred" for clarity.	No change
104.	3.6.2(b)(ii)	APA	Amend "network" to "Network" for consistency with the Rules.	Refer to paragraph 1.2.1
105.	3.6.2(b)(iii)	APA	Amend "technical envelope and secure state" to "Technical Envelope and Secure State" for consistency with the Rules.	Refer to paragraph 1.2.1
106.	3.6.2(b)(iv)	APA	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".	This information is collected as part of energy balancing and settlement.
107.	3.6.2(b)(v)	APA	Amend "system operations directions" to "System Operations Directions" for consistency with the Rules.	Refer to paragraph 1.2.1
108.	3.6.2(c)	APA	Amend "other registered NSPs" to "other Registered NSPs" for consistency with the Rules.	Refer to paragraph 1.2.1
109.	3.6.2(c)(ii)	APA	Amend "technical envelope and secure state" to "Technical Envelope and Secure State" for consistency with the Rules.	Refer to paragraph 1.2.1
110.	3.6.2(c)(iii)	APA	Amend "system operations directions" to "System Operations Directions" for consistency with the Rules.	Refer to paragraph 1.2.1

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111.	3.6.2(d)	APA	Amend "Registered controllers" to "Registered Controllers" for consistency with the Rules.	Updated paragraph 3.6.2(d)
112.	3.6.2(d)(ii)	APA	Amend "network" to "Network" for consistency with the Rules.	Refer to paragraph 1.2.1
113.	3.6.2(d)(ii)	APA	Amend "technical envelope and secure state" to "Technical Envelope and Secure State" for consistency with the Rules.	Refer to paragraph 1.2.1
114.	3.6.2(d)(iii)	APA	Amend "system operations directions" to "System Operations Directions" for consistency with the Rules.	Refer to paragraph 1.2.1
115.	3.7.1	APA	Insert "from the date the records were created" after "for at least 7 years".	Updated paragraph 3.7.1
116.	4.1.1(a)	APA	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.	Updated paragraph 4.1.1
117.	4.2	Horizon Power	It needs to be clarified how activation of a protocol is actually done - the drafting is not clear and also presents informal use of protocols.	Refer to: <ul style="list-style-type: none"> paragraph 4.2.2 of the Procedure – by email where there is sufficient time; paragraphs 4.2.3 and 4.2.4 of the Procedure – verbally where this is insufficient time Rule 83 of the Rules – Protocols may be used informally
118.	4.2.1	APA	Amend "registered NSP" to "Registered NSP" for consistency with the Rules.	Refer to paragraph 1.2.1
119.	4.2.1	APA	Amend "protocol" to "Protocol" for consistency with the Rules.	Updated paragraph 4.2.1
120.	4.2.3	APA	Amend "registered NSP" to "Registered NSP" for consistency with the Rules.	Refer to paragraph 1.2.1
121.	4.2.3	APA	Amend "Registered controller" to "Registered Controller" for consistency with the Rules.	Updated paragraph 4.2.3
122.	4.2.3	APA	Delete "the" after "thereafter" for clarity.	Updated paragraph 4.2.3

Item	Section	Submission	Stakeholder Comment	ISO Response
123.	4.2.3(a)	APA	Amend "incident coordinator" to "Incident Coordinator" for consistency with the Rules.	Updated paragraph 4.2.3(a)
124.	4.2.4	APA	Amend "incident coordinator" to "Incident Coordinator" for consistency with the Rules.	Updated paragraph 4.2.4
125.	4.2.4	APA	Amend "registered NSPs" to "Registered NSPs" for consistency with the Rules.	Refer to paragraph 1.2.1
126.	4.2.4	APA	Amend "Registered controllers" to "Registered Controllers" for consistency with the Rules.	Refer to paragraph 1.2.1
127.	4.2.4	APA	Replace "efficacious" with "efficient".	Updated paragraph 4.2.4
128.	4.2.4	APA	<p>3. Communication details between the Incident Coordinator, Registered NSPs and Registered Controllers</p> <p><u>Issue</u></p> <p>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></p> <p>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>	ISO will consider developing and consulting on a template. The template will not form part of the Procedure.
129.	4.2.5	APA	Amend "incident coordinator" to "Incident Coordinator" for consistency with the Rules.	Updated paragraph 4.2.5
130.	4.2.5	APA	Insert "with a view of achieving the System Security Objective" after "pre-contingent directions".	Updated paragraph 4.2.5

Item	Section	Submission	Stakeholder Comment	ISO Response
131.	4.2.6	APA	Amend "incident coordinator" to "Incident Coordinator" for consistency with the Rules.	Updated paragraph 4.2.6
132.	4.2.6	APA	Amend "registered NSP" to "Registered NSP" for consistency with the Rules.	Refer to paragraph 1.2.1
133.	4.2.6	APA	Amend "protocol" to "Protocol" for consistency with the Rules.	Updated paragraph 4.2.6
134.	4.2.7	APA	<p>4. Generators to be reimbursed for holding additional SRESS if directed under Rule 215</p> <p><u>Issue</u></p> <p>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></p> <p>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>	The ISO will review the current ESS arrangements as part of the ESS annual reporting process required under Rule 217 of the Rules.
135.	4.2.8	APA	Amend "enablement order of merit" to "Enablement order of merit" for consistency with the Rules.	Refer to paragraph 1.2.1
136.	4.2.8	APA	Insert "under Rule 206(5) of the Rules" after "Enablement order of merit" for clarity.	Updated paragraph 4.2.8
137.	4.2.9	APA	<p>5. Determination of the greatest security benefit by the ISO Control Desk where two or more providers have the same secondary FCESS cost</p> <p><u>Issue</u></p> <p>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.</p>	The ISO Control Desk must determine this dynamically in accordance with GEIP.

Item	Section	Submission	Stakeholder Comment	ISO Response
			<p>The Procedure is not clear on how the greatest security benefit is determined by the ISO Control Desk.</p> <p><u>Recommendation</u></p> <p>APA recommends that the ISO outline in the Procedure how the greatest security benefit will be determined by the ISO Control Desk.</p>	
138.	4.3.1	APA	Amend "system operations directions" to "System Operations Directions" for consistency with the Rules.	Refer to paragraph 1.2.1
139.	4.3.1	APA	Amend "technical envelope and secure state" to "Technical Envelope and Secure State" for consistency with the Rules.	Refer to paragraph 1.2.1
140.	4.3.1	APA	Delete "promptly" and replace with "as soon as reasonably practicable" for consistency throughout the Procedure.	The Rules refer to promptly. Promptly is defined in Rule 10 of the Rules.
141.	4.3.2	APA	Amend "integrated mining network" to "Integrated Mining Network" for consistency with the Rules.	Refer to paragraph 1.2.1
142.	4.3.3	APA	Amend "Pluto permitted direction" to "Pluto Permitted Direction" for consistency with the Rules.	Refer to paragraph 1.2.1
143.	4.3.3	APA	Amend "network user" to "Network User" for consistency with the Rules.	Refer to paragraph 1.2.1
144.	4.3.3	APA	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.	Updated paragraph 4.3.3
145.	4.3.3(i)	APA	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.	Updated paragraph 4.3.3(i)

Item	Section	Submission	Stakeholder Comment	ISO Response
146.	4.3.3(ii)	APA	Amend "disconnect the Pluto connection point from the NWIS" to "disconnect the Pluto Connection Point from the NWIS" for consistency with the Rules.	Refer to paragraph 1.2.1
147.	4.4.1	APA	Amend "incident coordinator" to "Incident Coordinator" for consistency with the Rules.	Updated paragraph 4.4.1
148.	4.4.2	APA	Amend "incident coordinator" to "Incident Coordinator" for consistency with the Rules.	Updated paragraph 4.4.2
149.	5	Woodside	<p>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 fall, 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.</p> <p>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.</p> <p>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.</p>	<p>The Protocol Framework is drafted to deal with unplanned events where an Incident Coordinator (the ISO Control Desk) is required to return the system to within the technical envelope and to a secure state.</p> <p>Disconnection due to non-compliance is likely "planned" and therefore can be assessed and mitigated.</p>

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150.	Appendix A1	Horizon Power	General comment: The document has extensive duplication in respect to and could be simplified greatly if the direction	Rule 79 and Rule 80 sets out the content of the Protocols, each Protocol is "stand alone" and therefore when read with the other Protocols includes duplication. The ISO has attempted to standardise requirements and numbering wherever possible.
151.	Appendix A4	Horizon Power	Refer to earlier comment regarding name change for "Terminal Device"	Refer to Item 18
152.	Appendix E Incident Coordinator Permitted Directions point 4	Horizon Power	Would suggest rewording this - seems very open ended with not context	The Protocols will continuously improve to reflect learnings and practical implications
153.	Appendix E Incident Coordinator Permitted Directions point 5	Horizon Power	This highlighted section is confusing "(if something required of any person by a person exercising power under the emergency provisions causes a loss of, or threat to, power system reliability, security and safety)"	Deleted point 5
154.	Appendix B Permitted Directions	Horizon Power	General comment - consider having all directions available for all scenarios, this could significantly simplify the entire document and empower the incident coordinator to make appropriate decisions to maintain system security and stability - it is conceivable that a number of these directions which are not highlighted as available could be relevant in discrete circumstances.	Rule 188(3) of the Rules outlines the permitted content of a direction. The Protocol Framework sets out the credible and non-credible contingencies and the directions that may be reasonably necessary to achieve the System Security Objective. The ISO notes that the Protocol Framework has been developed generally in consensus with the NSPs, more than one Protocol may be activated at any time, and that the Protocol Framework is designed to be refined and improved over time following incident investigations.
155.	Appendix B, Disconnect, in the part or in the whole, a network or facility	Horizon Power	This should include disconnection and reconnection of a network or facility	Appendix B updated

ISO INITIATED CHANGES – INTERIM PROTOCOL FRAMEWORK PROCEDURE v1.1

Item	Section	Initiated by	Comment	Change
1.	N/A	ISO	Standardisation across all of ISO's Procedures.	Updated wording, structure and formatting to standardise across all of ISO's Procedures.
2.	1.2.4	ISO	Definitions Table	Added acronyms and terms used in the Procedure into Table 1.
3.	2.3	ISO	Provide further detail on responsibilities for network and power system synchronisation.	Updated section 2.3
4.	3.4	ISO	Update wording in section 3.4 to ensure consistent and linked with notifiable events section in Interim EBAS Procedure.	Updated section 3.4 to include a note on notifiable events.