

Our ref: ID60-425842108-57623
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29 September 2026

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Submitted via email to: energymarkets@deed.wa.gov.au

Dear Ms Guzeleva,

Western Power response to the PSSR Standards Review Consultation Paper

Western Power welcomes the opportunity to comment on DEED's PSSR Standards Review Consultation Paper: System Strength regulatory incentives framework and Technical standards for hybrid systems.

The proposals represent the next stage in establishing an end-to-end framework for managing System Strength as the SWIS transitions to increasing levels of inverter-based resources. Western Power considers that clearer connection requirements, improved modelling and stronger operational tools will advance the State Electricity Objective and help deliver secure, reliable and efficient electricity services for Western Australian consumers.

Western Power's principal positions are:

- **Proposals 1:1 and 1:2:** Support mandatory GFM requirements in identified low System Strength regions and retention of the do-no-harm framework elsewhere. Detailed design should clarify the regional trigger, geographic application, transition arrangements and scope of the do-no-harm test.
- **Proposals 1:3 to 1:5:** Support System Strength related operational constraints, curtailment prioritisation and a tie-break mechanism. Detailed design should ensure these measures are technically effective, operationally workable and appropriately integrated with planning processes and other WEM obligations.
- **Proposals 2:1 to 2:4:** Support the hybrid-system framework, subject to detailed design of integrated and subsystem assessment, credible operating modes, GPS structuring and preliminary assessment through the connection process.
- **Proposal 3:1:** Strongly support requiring Market Participants responsible for existing Transmission Connected Generating Systems with a Nameplate Rating of 10 MVA or greater to obtain and provide adequate EMT models upon request from the Network Operator. This addresses the gap for facilities that connected before EMT models became a connection requirement. New connection applicants, Relevant Generator Modifications and facilities



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already subject to model submission, maintenance or update obligations should continue to be managed under the existing ESM Rules and Western Power WEM Procedure.

- **Proposal 3:2:**

- Western Power recognises the wider system benefit of obtaining EMT models from legacy facilities but has concerns with the proposed full-cost reimbursement obligation.
- Publicly available arrangements reviewed in other jurisdictions generally place responsibility for providing compliant facility models on the facility owner or connection applicant, and Western Power has not identified a comparable arrangement that routinely requires the Network Operator to reimburse the full model-development cost.
- The proposed approach also creates a misalignment between responsibility, control and cost. Market Participants would remain responsible for providing compliant models and would control much of the facility information, OEM engagement and technical access required for their development, while Western Power would bear the reimbursement obligation without fully controlling the resulting expenditure, delivery or model quality.
- The benefits of the models would also extend across the broader power system, while the reimbursement obligation would be allocated solely to Western Power.
- If the final framework requires Western Power to partially contribute towards reasonable and efficient EMT model-development costs, that contribution should be governed by a formal **cost contribution framework**.
- The framework should preserve appropriate Market Participant responsibility, define eligible costs and contribution limits, and ensure that any broader customer impacts are reasonable and proportionate to the system-wide benefit.

- **Proposal 3:3:** Strongly support making failure to provide a required EMT model a civil penalty provision.

- **Proposal 4:1:** Strongly support a framework enabling Western Power to review and require changes to facility control settings where technically necessary.

Western Power's detailed positions and responses to the consultation questions are provided in **Appendix A**.

Western Power acknowledges DEED's leadership in progressing these reforms and the collaborative work undertaken with AEMO and Western Power. We look forward to continuing this collaboration with DEED, AEMO and industry through the detailed ESM Rule design.

The final framework should support increasing levels of inverter-based resources while maintaining power-system security and reliability and promoting efficient investment for the long-term benefit of Western Australian electricity consumers.

Should you have any queries, please contact **Andy Singh Kondola** (Energy Market Regulation Manager) by email at andy.kondola@westernpower.com.au.

Yours sincerely

Matt Veryard
Head of Regulation

Appendix A: Detailed Response to System Strength Regulatory Incentive Framework Proposals

A.1 System Strength Regulatory Incentive Framework (SSRIF)

Proposal	Western Power position	Western Power response
Proposal 1:1: Mandatory GFM Technical Standards in low-System-Strength regions	Support	Requiring new ESRs in identified low-System-Strength regions to meet the GFM Technical Standards provides an appropriate prospective connection signal. Detailed design should clearly define the trigger, affected locations, Connection Point mapping method and transition arrangements.
Proposal 1:2: Existing do-no-harm framework	Support	Retain the do-no-harm framework outside identified low-System-Strength regions. The final framework should define the scope and materiality of the test and focus on material adverse effects on System Strength, network performance and existing users. A reduction in remaining hosting capacity should not, by itself, constitute harm.
Proposal 1:3: Operational constraints informed by Limit Advice	Support	Operational constraints informed by Western Power Limit Advice provide an important mechanism for managing System Strength conditions. Detailed design should clarify the facilities and system conditions in scope, distinguish temporary operational measures from enduring planning responses, and preserve Western Power's Limit Advice role and AEMO's operational responsibility.
Proposal 1:4: Curtailment prioritisation framework	Support subject to detailed implementation	Differentiated curtailment should be technically effective for the relevant System Strength condition and appropriately address planned outages, facility operating configurations and interactions with Capacity Credits, Reactive Power Capability and other WEM services. Power System Security should remain the overriding consideration. Detailed design should assess how System Strength-related constraints interact with the Reserve Capacity Mechanism, including Network Access Quantities, capacity availability assumptions and Capacity Credit obligations.
Proposal 1:5: Tie-break framework	Support	The tie-break mechanism should provide transparent and consistent treatment where facilities cannot otherwise be differentiated. The methodology should be objective, repeatable, operationally workable for AEMO and transparent to affected facilities, while considering material interactions with other WEM services.

A.1.1 Consultation Questions 1(a) and 1(b)

Western Power supports the mandatory GFM requirement in Proposal 1:1 and the curtailment prioritisation framework in Proposal 1:4. Western Power recommends that the detailed design should:

- clearly define the trigger, geographic application, Connection Point mapping and transition arrangements, and
- preserve Power System Security as the overriding principle and ensure that the differentiated curtailment is technically effective and operationally workable.

A.2 Hybrid Systems Framework

Proposal	Western Power position	Western Power response
Proposal 2:1: Integrated system and subsystem assessment	Support subject to technical confirmation	Integrated assessment at the Connection Point or applicable Measurement Point appropriately reflects the combined facility response, while subsystem assessment allows GFM capability, control interactions and material subsystem limitations that may not be visible in the combined response to be identified. Detailed design should clarify the relationship between integrated and subsystem performance, the applicable Measurement Location and supporting model and evidence requirements.
Proposal 2:2: Compliance Requirements Per Operating Mode	Support	Compliance should be assessed across credible operating modes that materially affect performance, including subsystem availability, available headroom, expected facility response, operational constraints and the applicable compliance pathway. The methodology should define credible operating modes and record material operating restrictions or limitations in the Registered GPS.
Proposal 2:3: Registered GPS Structuring	Support	A flexible, evidence-based GPS structure should allow a single Registered GPS, structured annexures or multiple Registered GPSs where justified by the facility configuration. The selected structure should clearly identify enforceable whole-facility and subsystem obligations.
Proposal 2:4: Timing of Assessment	Support subject to implementation confirmation	Preliminary assessment at R0 should provide early guidance on hybrid-system classification and likely GPS structure without constituting final approval before the necessary models, studies and evidence are available. Staged and retrofit projects should be assessed at the earliest practicable modification-assessment stage.

A.2.1 Consultation Question 2(a)

Western Power supports assessing hybrid systems at the Connection Point or applicable Measurement Point, supported by structured subsystem capability assessment, credible operating modes and flexible GPS structuring.

The detailed WEM Procedure should define the assessment methodology, Measurement Locations and supporting evidence requirements.

A.2.2 Consultation Question 2(b)

Western Power considers that the Relevant Generator Modification process provides the appropriate starting framework for assessing retrofit configurations. The proposed WEM Procedure

should clarify the applicable trigger, scope of reassessment, treatment of existing Registered GPS obligations and circumstances in which a proportionate assessment is appropriate.

A.3 Submission of EMT models by existing facilities

Proposal	Western Power position	Western Power response
Proposal 3:1: Provision of EMT Models by Existing Facilities	Strong support	Requiring relevant Transmission Connected Generating Systems of at least 10 MVA to provide adequate EMT models is essential to maintaining the SWIS EMT base case and supporting reliable power-system studies. Proposal 3:1 is required to address the existing regulatory gap for legacy Transmission Connected Generating Systems that were not previously required to provide an EMT model and are not otherwise undertaking a new connection or Relevant Generator Modification process. The detailed framework should clearly distinguish this cohort from facilities already subject to model-submission, validation and maintenance obligations under the existing ESM Rules and Western Power WEM Procedure. Western Power should retain flexibility to stage and prioritise requests according to System Strength risk, broader power-system-security needs and modelling priorities. Detailed design should establish clear model, validation, licensing, delivery, remediation and acceptance requirements.

Proposal 3:2: Reimbursement of Reasonable Model- Development Costs	Support subject to a defined cost contribution framework and reasonable, efficient and proportionate customer impacts	The existing ESM Rules and Western Power's <i>WEM Procedure: Generation System Model Submission and Maintenance</i> already place responsibility on Market Participants to provide and maintain compliant Generation System Models for new and modified Transmission Connected Generating Systems. This includes ESM Rules clause 3A.4.2 and Appendix 12 clause A12.17.3.2, together with sections 3.1, 3.2, 3.3.2 and 3.7 of the WEM Procedure covering model submission, maintenance and EMT-specific requirements. Proposal 3:1 is intended to address the regulatory gap for legacy Transmission Connected Generating Systems that were not previously required to provide an EMT model. Any cost contribution mechanism should therefore be limited to the initial EMT model requested from an eligible legacy facility under Proposal 3:1. It should not apply to new connection applicants, Relevant Generator Modifications, participant-initiated facility or control-system changes, correction of deficient models, or ordinary model-maintenance and update obligations. The detailed rules should clearly establish this boundary. The proposed reimbursement proposal creates a potential misalignment between responsibility, control and cost. Market Participants should remain responsible for providing compliant models and control much of the facility information, original equipment manufacturer engagement and technical access required for their development. Under this proposal, Western Power would bear the reimbursement obligation without fully controlling the resulting expenditure, delivery timeframe or model quality. This could create delivery and accountability risks and impede the timely availability of models needed to assess and manage power-system-security issues. In addition, the benefits of the EMT models extend across the broader power system, including to AEMO and future participants, while the reimbursement obligation would be allocated solely to Western Power. The responsibility for providing an accurate technical model of a facility ordinarily rests with the Market Participant that owns or operates that facility. This is consistent with arrangements in other jurisdictions, where facility owners or connection applicants are required to provide compliant models to the relevant system and network operators. Western Power has not identified an equivalent arrangement that routinely requires a Network Operator to reimburse the full development cost for existing-facility EMT models. If the final framework requires Western Power to contribute towards the reasonable and efficient costs of developing EMT models for eligible legacy facilities, that contribution should be governed by a formal cost contribution framework rather than an automatic full-cost reimbursement obligation. The framework should define eligible and excluded costs, appropriate contribution limits, participant responsibilities, cost benchmarking, prior approval, payment milestones, model acceptance, licensing, treatment of delay or inadequate deliverables, administration and cost recovery.
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Proposal	Western Power position	Western Power response
		Any Western Power contribution will likely result in these costs being recovered from electricity customers, subject to the applicable regulatory arrangements. A cost contribution framework should therefore preserve appropriate Market Participant responsibility and ensure that Western Power expenditure is reasonable, efficient and proportionate to the wider system benefit.
Proposal 3:3: Civil Penalty Provision	Strong support	Making the EMT model obligation a civil penalty provision should encourage timely engagement and delivery where curtailment alone may not provide a sufficiently early or consistent incentive. The model standard and delivery obligation should be clearly defined, with the ERA retaining its independent investigation and enforcement role.

A.3.1 Consultation Question 3(a)

Western Power strongly supports requiring EMT models from existing facilities within the proposed scope. Accurate models are essential to maintaining the SWIS EMT base case and undertaking reliable System Strength, control-interaction and broader power-system security studies.

A.3.2 Consultation Question 3(b)

Western Power recognises the wider system benefit of obtaining accurate EMT models from legacy facilities and supports making an appropriate contribution towards reasonable and efficient model-development costs.

Any contribution should be limited to the initial EMT model requested from an existing Transmission Connected Generating System that was not previously required to provide one. It should not apply to new connections, Relevant Generator Modifications, participant-initiated changes, correction of deficient models, or ordinary model-maintenance and update obligations.

Market Participants should nevertheless retain appropriate responsibility for the technical representation of the facilities they own and operate. Market Participants are generally best placed to provide the plant information, historical records, OEM engagement and technical access needed to develop and validate an accurate model. Publicly available arrangements reviewed in other jurisdictions generally place the model-provision obligation on the relevant facility owner or connection applicant. Western Power has not identified a comparable arrangement that routinely requires a Network Operator to reimburse the full cost of developing models for existing facilities.

EMT model-development costs may vary significantly between facilities due to plant age, information quality, OEM availability, previous modifications, testing requirements and the extent of validation or remediation required. Applied across the relevant existing fleet, an automatic full-reimbursement obligation could create material and uncertain financial and administrative exposure for Western Power.

Depending on the final funding and regulatory treatment, Western Power's expenditure may also ultimately be recovered from electricity customers. It is therefore important that any contribution is reasonable, efficient and proportionate to the wider system benefit, while preserving appropriate cost and delivery incentives for Market Participants.

Western Power recommends that any financial assistance be provided through a formal **cost contribution framework**, rather than automatic full reimbursement. The framework should define:

- eligible and excluded costs;
- the basis and maximum limits of Western Power's contribution;
- Market Participant responsibilities;
- cost benchmarking and prior approval requirements;
- payment and model-acceptance milestones;
- licence and permitted-use requirements;
- treatment of delay, inadequate information or deficient deliverables;
- Western Power's administration costs; and
- the applicable funding and cost-recovery arrangements.

This approach would recognise the system-wide value of obtaining legacy models while providing an appropriate allocation of responsibilities, risks and costs between Western Power and Market Participants.

A.3.3 Consultation Question 3(c)

Western Power supports including EMT model non-compliance in the curtailment prioritisation framework where technically effective and operationally practicable.

Detailed design should clarify whether treatment applies to facility output, inverter availability or another operating parameter, and how the relevant constraint will be implemented by AEMO. Curtailment should remain subject to the overriding requirement to maintain Power System Security.

A.4 Framework for Control-Settings Changes

Proposal	Western Power position	Western Power response
Proposal 4:1: Registered Capability and Operational Settings	Strong support	Distinguishing Registered GPS capability from operational settings and establishing clear authority for Western Power to require control-setting changes will address an existing gap. Detailed design should define the settings in scope, technical triggers, consultation, assessment, testing and implementation requirements, and interaction with the Registered GPS, Relevant Generator Modification and EMT model frameworks.

A.4.1 Consultation Question 4(a)

Western Power supports Proposal 4:1 and does not propose to provide reasons or evidence opposing the proposed framework.

A.4.2 Consultation Question 4(b) and 4(c)

Western Power considers that these questions are principally directed to Market Participants and OEMs with direct knowledge of facility settings, technical limitations and implementation impacts.

Western Power proposes to consider the feedback received and work with DEED, AEMO and industry when developing the detailed ESM Rule provisions and WEM Procedure. Specific technical matters identified through Western Power's internal SME review may be included in the final response.

Our ref: ID60-42842108-57567
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29 September 2026

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Submitted via email to: energymarkets@deed.wa.gov.au

Dear Ms Guzeleva,

Western Power Response to Power System Security and Reliability Standards Review Information Paper and Exposure Draft Electricity System and Market Amending Rules

Western Power welcomes the publication of the *Power System Security and Reliability Standards Review Information Paper* and *Exposure Draft Electricity System and Market Amending Rules*.

As the energy landscape evolves and increasing levels of inverter-based resources connect to the South West Interconnected System (**SWIS**), clear technical requirements and coordinated System Strength planning will become increasingly important. Western Power considers that the proposed reforms broadly advance the State Electricity Objective by supporting secure and reliable electricity supply, efficient investment and greater certainty for connecting proponents and existing Market Participants. Over time, these outcomes should support an affordable, reliable and sustainable electricity system for Western Australian consumers.

The proposed grid-following (**GFL**) and grid-forming (**GFM**) technical standards for inverter-based resources were developed collaboratively by Western Power and AEMO and reflect stakeholder feedback on Western Power's December 2025 Technical Paper, *Technical Requirements and Access Standards for Inverter-Based Resources*. Western Power considers that Part 1 of the *Exposure Draft* gives appropriate effect to the agreed technical framework.

Western Power will update the "*Generator Performance Standards (GPS): Guideline for the assessment of technical requirements¹*" and associated templates, in consultation with AEMO, to assist proponents in understanding the assessment approach and information required under the amended standards. Western Power intends to make the updated guideline and supporting material available for commencement of the new Rules.

Western Power also endorses the central elements of the SWIS System Strength Framework, including:

- AEMO undertaking the System Strength Shortfall study and publishing the System Strength Report;
- establishment of the Forecast and Planning Coordination Group;
- collaborative development of the relevant forecasts, methodology, scenarios and inputs;

¹ [Generator Performance Standards Western Power resource page](#)

- integration of forecast System Strength Shortfalls into the Transmission System Plan; and
- consideration of participant, operational, network and non-network responses.

Western Power recommends the following targeted refinements to “**Part 2: SWIS System Strength Framework**”:

- **Clause 2.2C.1(cC):** Delete the proposed function requiring the Network Operator to alleviate every forecast System Strength Shortfall. The existing frameworks already provide for appropriate responses to be assessed and responsibility for procurement and payment to be determined.
- **Clause 3.11A.3(bA):** Qualify the delivery-timing requirement so that it enables flexibility for existing or late-emerging needs.
- **Clause 4.5C.2(b):** Clarify that the agreed FPCG forecast is an input into relevant publications and does not displace fit-for-purpose network-planning forecasts, assumptions, scenarios or sensitivities.
- **Clauses 4.5D.4 to 4.5D.7:** Document the respective AEMO and Western Power responsibilities for fault-level assessment through the FPCG Terms of Reference, System Strength methodology and/or WEM Procedure.
- **Clauses 4.5B.2 and 4.5D.1:** Provide a limited mechanism for the Coordinator to approve alternative publication arrangements in exceptional circumstances.

Further detail on each matter is provided in **Appendix A**.

Western Power considers that these refinements will preserve the reform objectives while improving accountability, practical implementation and the allocation of responsibility. This will help establish an enduring framework capable of supporting the continued transformation of the SWIS and delivering secure, reliable and efficient outcomes for current and future electricity consumers.

Western Power looks forward to continuing to work with DEED, AEMO and industry stakeholders to finalise and implement the reforms.

Should you have any queries, please contact **Andy Singh Kondola** (Energy Market Regulation Manager) by email at andy.kondola@westernpower.com.au.

Yours sincerely



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Executive Manager
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Appendix A: Detailed Western Power Response

Clause and subject	Matter for consideration	Western Power position and recommendation
Clause 2.2C.1(cC): Alleviation of forecast System Strength Shortfalls	Proposed clause 2.2C.1(cC) predetermines the Network Operator as responsible for alleviating every forecast System Strength Shortfall through network reinforcement or procurement of a non-network solution. This allocation occurs before determining the cause of the shortfall, whether the condition is temporary or enduring, the appropriate response, technical feasibility, customer benefit, or responsibility for procurement and payment. Sections 3.11A and 3.11B already establish the framework for identifying, assessing, approving and procuring an NCESS. Under that framework, Western Power, AEMO or both may refer a potential need to the Coordinator. The Coordinator determines whether procurement should proceed and identifies the party or parties responsible for procurement and payment. Existing clause 2.2C.1(bB) also already confers on Network Operators the function of procuring NCESS in accordance with sections 3.11A and 3.11B. The proposed clause may therefore pre-empt and duplicate the existing assessment and allocation framework.	Delete clause 2.2C.1(cC). Western Power recognises that it will often be the appropriate party to assess and progress network augmentation or NCESS procurement for an enduring residual System Strength need on its network. However, responsibility should not be predetermined before participant remediation, operational measures, network responses and the existing NCESS framework have been considered. The appropriate response, and responsibility for procurement and payment, should continue to be determined through the applicable participant, operational, network, investment and NCESS frameworks.
Clause 3.11A.3(bA): Timing of an NCESS submission	The proposed clause requires the submission date to allow a non-network solution to be procured, developed and delivered in time to alleviate or materially reduce the relevant event. This condition may be impossible to satisfy where a need already exists, arises unexpectedly or is identified without sufficient lead time. It could prevent an otherwise appropriate submission even where a staged or later solution would materially reduce the duration or impact of the issue.	Amend clause 3.11A.3(bA) to recognise reasonable practicability. The submission should be required to: • be made as soon as reasonably practicable after the need is identified; • include a reasonable estimate of procurement, development and delivery timeframes; and • allow sufficient time for delivery before the relevant event to the extent reasonably practicable. Proposed redrafting for consideration: <i>(bA) if the submission is for a proposed non-network solution:</i> <i>i. be made as soon as reasonably practicable after the need for the</i>

Clause and subject	Matter for consideration	Western Power position and recommendation
		<i>proposed non-network solution is identified;</i> <i>ii. include the Network Operator's or AEMO's reasonable estimate, as applicable, of the time required for the solution to be procured, developed and delivered; and</i> <i>iii. to the extent reasonably practicable, be made by a date that allows for the solution to be procured, developed and delivered in time to alleviate or materially reduce the impact of the event identified under clause 3.11A.2(a), 3.11A.2(b), 3.11A.2(c), 3.11A.2(d), 3.11A.2(e) or 3.11A.2(f); and</i>
Clause 4.5C.2(b): FPCG forecast	Western Power supports the FPCG annually developing and agreeing a forecast covering the connection and Electrical Location of Loads and Energy Producing Systems. Western Power interprets this as an agreed FPCG forecast developed for use as an input into the System Strength Report and other relevant publications. The relevant planning processes have different purposes, time horizons, methodologies, scenarios, information cut-off dates and risk tolerances. The FPCG forecast should not require each process to produce identical outcomes, use identical assumptions or treat the forecast as its sole information source.	Clarify that the FPCG forecast is an agreed input into the relevant publications and planning processes. Western Power's preferred approach is for AEMO to prepare and maintain the draft forecast using relevant inputs provided by DEED and Western Power, with the FPCG agreeing the methodology, assumptions and final forecast. Each responsible entity should retain the ability to consider additional or different fit-for-purpose forecast inputs, assumptions, scenarios and sensitivities relevant to its particular function. Western Power must retain the ability to apply information and assumptions it considers relevant to its network-planning studies and statutory, regulatory, technical and planning responsibilities. Proposed amendment to Clause 4.5C.2(b): "..assist AEMO to prepare and maintain the draft forecast on behalf of the Forecast and Planning Coordination Group using information provided by its members in accordance with the terms of reference developed under clause 4.5C.3."

Clause and subject	Matter for consideration	Western Power position and recommendation
Clauses 4.5D.4 to 4.5D.7: Minimum fault-level assessment	The Information Paper records Western Power's feedback that AEMO is better placed to undertake fault-level forecasting activities, with input from Western Power. The Exposure Draft places accountability for the overall System Strength Shortfall assessment and System Strength Report with AEMO but does not expressly describe the detailed division of technical work between AEMO and Western Power. Western Power considers that the Exposure Draft does not preclude the intended assessment process, but the responsibilities should be clearly documented during implementation.	Support the proposed allocation without seeking additional prescriptive rule drafting and ensuring that the ToR for the FPCG or the System Strength Methodology (or the relevant document as deemed by DEED) outlines the detailed division of work. The intended process should be that: 1. AEMO selects representative study cases for each study year and scenario through the FPCG-agreed methodology; 2. Western Power uses the agreed cases to calculate the minimum fault level required for network protection operation and the forecast minimum synchronous-source fault level; 3. Western Power provides the results, network information, models and analysis to AEMO; 4. AEMO incorporates those inputs into the overall effective and sufficient System Strength assessment; and 5. AEMO seeks FPCG agreement on the identified shortfalls and publishes the System Strength Report. This division should be documented through the FPCG Terms of Reference, System Strength methodology, model and study-case protocols, and the WEM Procedure developed under clause 4.5D.7.
Clauses 4.5B.2 and 4.5D.1, with proposed new clause 4.5C.7: Alternative publication arrangements	Western Power supports regular publication of the annual TSP and biennial System Strength Report. However, the proposed Rules do not provide a contingency mechanism where exceptional circumstances make the ordinary publication timetable impracticable, result in materially unreliable or outdated information, substantially duplicate another publication, or make an alternative arrangement more consistent with efficient and coordinated planning.	Retain the regular publication cycles as the default and introduce a limited alternative-publication mechanism. AEMO or a Network Operator should be able to request an alternative arrangement. After consulting the FPCG, the Coordinator could determine: 1. a deferred publication date; 2. a streamlined publication; 3. a supplementary publication; 4. reliance on another specified publication for particular requirements; or

Clause and subject	Matter for consideration	Western Power position and recommendation
		5. where no lesser alternative is appropriate, waiver for the relevant publication cycle. The Coordinator should publish the determination, reasons, alternative arrangements and applicable dates. Proposed additional clause to support this: 4.5C.7. <i>(a) The Coordinator may determine alternative publication arrangement for a Transmission System Plan required under clause 4.5B.2 or a System Strength Report required under clause 4.5D.1, including a deferred publication date, reduced or supplementary requirements or a waiver of the relevant cycle where justified by exceptional circumstances.</i> <i>(b) The Coordinator must publish any determination made under section 4.5C.7 with alternative arrangements and applicable dates.</i>