



The current RCP seeks to also grant this right to an interconnected NSP. Horizon Power is concerned that granting such a right under the PNR incorrectly implies that the interconnected NSP will be actively monitoring the behaviour of the Integrated LNG System, primed to take action in the event they threaten the broader system. Such monitoring behaviour is reflective of an NSP monitoring a Network User for which it is responsible for. As that is not the case for an interconnection between two networks, the right for one NSP to disconnect another should not be embedded in the PNR (as is currently the case for the legacy NSPs).

Horizon Power recommends that the following aspects of the RCP be amended as follows:

Remove “registered NSP of any network to which the system is connected” from Definition of Integrated LNG Network.

Remove “The registered NSP of a network to which an integrated LNG system is connected” and “Registered NSP” from Rule 188A.

Horizon Power also note interconnected NSPs may have separate agreements governing the terms of interconnection which may include rights to disconnect under certain scenarios. These are separate arrangements however to the governance of the interconnected system to which the PNR relates.

2. Please provide an assessment whether the change will better facilitate the achievement of the Pilbara electricity objective.

In Horizon Power’s view the RCP supports the Pilbara Electricity Objective by facilitating the connection of an islanded system to the Pilbara. The successful connection of the Pluto LNG Facility will serve as a significant precedent for the connection of future islanded systems in the Pilbara, resulting in cost savings to the industry through centrally procured essential system services and alternative supplier arrangements.

3. Please indicate if the proposed change will have any implications for your organisation (for example changes to your IT or business systems) and any costs involved in implementing the changes.

The proposed change is not expected to have any direct impacts on Horizon Power’s compliance requirements with the PNR.

4. Please indicate the time required for your organisation to implement the change, should it be accepted as proposed.

The proposed change is not expected to have any direct impacts on Horizon Power’s compliance requirements with the PNR.
