

Pilbara Networks Rules Rule Change Proposal Submission

Submitted by: Woodside Energy Ltd

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CPC measures are being discussed as part of the connection and application process.

Woodside proposes the addition of a new rule 274C(6) to recognise that certain steps have already been satisfied in respect of the Pluto Facility (noting that the final form of this new rule will depend on the progress that has been made up to 31 March 2023).

6. Interaction of rule 274 and rule 274K

Woodside notes that the drafting appears to contemplate two procedures dealing with the CPC matters in Subchapter 9.3:

- (a) existing rule 274 has been amended to state that the 'access and connection procedure' contemplated in the PNR will now extend to the ISO's functions under Subchapter 9.3 (in addition to Subchapter 9.2); and
- (b) new rule 274K further provides for a new 'CPC procedure' for the purposes of Subchapter 9.3.

Given the apparent overlap between these two procedures, Woodside considers that new rule 274K may be unnecessary, and its content could instead be covered in the rule 274 procedure. The relationship between these two procedures should be clarified in the Final Rule Change Report.

Please see Woodside's proposed drafting changes below to address these points.

Annexure

Existing rule / Proposed rule	Proposed drafting change to some of the Coordinator's proposed amending rules set out in Section 7 of the Report or3156.84t76
8(1) – Definition of	

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Existing rule /	Proposed drafting change to some of the Coordinator's proposed
Proposed rule	amending rules set out in Section 7 of the Report

[Woodside Drafting Note: Change is for clarity only – we understand this is the intention of the drafting.]

Existing rule / Proposed rule	Proposed drafting change to some of the Coordinator's proposed amending rules set out in Section 7 of the Report

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	(a)	must take the CPC measures into account when performing their functions under Subchapter 9.2;	
	(b)	must take the existence of, and ongoing compliance with, <i>CPC measures</i> into account when exercising the power in rule 25(2) in relation to an integrated facility; and	
	(c)	may take any <i>CPC measures</i> into account when performing any other function under the Act, the <i>PNAC</i> or these <i>rules</i> (including when preparing any procedure or protocol).	
274J(2)	coni the d	The controller of an integrated facility which has been permitted to connect under this Subchapter 9.3 (or the connection applicant on the controller's behalf) must notify the ISO of any potentially relevant modification to its facility.	