

09 March 2023

Energy Policy WA (EPWA)
David Malcolm Justice Centre
28 Barrack Street
Perth, Western Australia, 6000



By Email: EPWA-info@dmirs.wa.gov.au

Dear Sir/Madam

Submission to Energy Policy WA on the new State Electricity Objective (SEO)

Thank you for the opportunity to review and provide comments on the proposed drafting for the new State Electricity Objective (**SEO**), planned for inclusion in the *Electricity Industry Act 2004* (WA) (the **Act**) and subsidiary legislative instruments made under the Act.

This submission sets out Horizon Power's comments on EPWA's recently released consultation paper, '*Electricity Industry Amendment Bill: Consultation on the proposed State Electricity Objective*' (**Consultation Paper**) and the draft SEO set out therein.

Horizon Power has not sought to comment on how the new SEO may be incorporated into the Act or its subsidiary legislative instruments. In this regard, Horizon Power looks forward to the opportunity to comment on the proposed amendments to the Act and its subsidiary legislative instruments when that drafting becomes available for comment.

A. Executive summary

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3 limbs of SEO objective as being “of equal precedent”. Horizon Power would like to understand how these points should be reconciled.

Paragraph 4 of SEO

Paragraph 4 of the draft SEO defines “electricity services”, and includes a number of examples of the types of things which constitute “electricity services”. Horizon Power considers that, for the sake of clarity, it would be prudent also list “security and system operations” as constituting “electricity services”.

Yours sincerely

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Sandy Morgan
Senior Manager Pilbara Network
HORIZON POWER