



Sustainable Energy Now Inc.
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Energy Policy WA
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EPWA-Submissions@dmirs.wa.gov.au

Proposed Changes to the Electricity Networks Access Code – Priority Projects

We are writing to you in response to the above consultation paper.

SEN supports the proposed changes.

SEN hopes the energy minister will use the proposed new powers wisely to quickly identify priority projects so as to accelerate the clean energy transition in WA for the benefit of all West Australians.

SEN has concerns that the energy transition in WA is being delayed due to:

1. SWIS connection delays for major customers such as renewable energy projects that lead to:
 - a. Project delays;
 - b. Reduction in investor confidence in WA;
 - c. Reduction in confidence in the SWIS as a grid connection option for new projects;
 - d. Increased risk of power outage as the replacement generation projects are delayed, the coal fleet ages with reduction in reliability, coal supply and other supply chain issues, experienced resources leaving the industry etc;
 - e. Increased emissions (prolonged coal use, use of diesel etc);
 - f. Increase cost pressures on electricity tariffs.
2. Uncertainty on funding the network augmentation projects leading to further investment uncertainty and further delays;
3. Lack of clearly communicated transition plan that takes into account the fundamental change in the operational context for all affected agencies (including Energy minister's office, EPWA, AEMO, ERA, Western Power and Synergy) brought about by the rapid energy transition.

SEN acknowledges that the electricity system in WA has been established on a market driven basis and that the legislative underpinning of the system cannot be amended in the time frame available to meet the needs of the transition to clean energy.

SEN is concerned that the current market rules and regulatory approach does not enable new generation to enter the market in a timely fashion and SEN encourages the government to work with Western Power, ERA, AEMO and other stakeholders to address these concerns.

SEN believes that one solution is for the government to enable Western Power to employ more staff to deal with the transition, network upgrades and new major customer connections issues. SEN acknowledges this may require the government to work with the ERA and the industry to achieve this outcome.

Western Power could be encouraged to review its connection processes and set reportable KPIs for major customer connection times.

The transition plan would complement the WoSP and address meeting major customer expectations and those of the wider community. In addition to scope, schedule and budget, the transition plan would also need to address funding, supply chain, resourcing and also risk. The ability to execute the scale of transmission projects in the required timeframe, given the headwinds on supply chain, resources and social licence, is a major risk that warrants a specific risk treatment plan.

Recognising that rooftop solar and large-scale batteries are projects that are easier to execute in the current climate, it could pay to look at a parallel option of encouraging additional rooftop solar (including on commercial and industrial properties) combined with distribution network upgrades and storage.

Monitoring the performance of the transition plan by the various agencies, from a cost, schedule, quality, risk and governance perspective, would also be a major consideration given the scale of change, institutional inertia and organisational capability. We are not suggesting a significant system structural change required legislative approval, such as a transition authority.

We look forward to your response, and the opportunity to discuss this topic in more detail.

Yours faithfully,

A handwritten signature in blue ink that reads "Fraser Maywood". The signature is written in a cursive, flowing style.

Fraser Maywood
Chair
Sustainable Energy Now Inc

Sustainable Energy Now Inc. (SEN) is a not-for-profit incorporated association advocating for the utilization of sustainable energy sources within Western Australia.