

# Wholesale Electricity Market

## Submission to Procedure Change Proposal

### Procedure Change number Technical Requirements for Standard Small User Facilities

Submitted by:

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Clause 2.10.7 of the Electricity System and Market Rules provides that any person may make a submission for a Procedure Change Proposal (including proposals developed by AEMO, the Economic Regulation Authority, the Coordinator of Energy or a Network Operator) by completing this Procedure Change Submission form.

Submissions should be provided by email to the nominated contact in the call for submissions published with the Procedure Change Proposal.

## INTRODUCTION

Synergy welcomes the opportunity to provide feedback on the Western Power Wholesale Electricity Market (**WEM**) Procedure for *Technical Requirements for Standard Small User Facilities (Procedure)* released on 25 November 2025. Synergy is generally supportive of the proposed Procedure which establishes the Technical Requirements for all Standard Small User Facilities.

The Procedure creates the enforceable foundational technical structure for future integration, connection and participation of Distributed Energy Resources (**DER**) in the South West Interconnected System (**SWIS**).

Synergy understands the purpose of the Procedure is to facilitate the continued integration of DER in the SWIS. Synergy provides its high-level feedback below on the Procedure and considers there is a need for increased clarity within the Procedure. Synergy's more detailed drafting suggestions for Western Power's consideration is included in Annexure 1.

## KEY CONCERNS AND MITIGANTS

### 1 Network Operator transfer of network safety connection obligations to Market Participant

Synergy considers the current drafting of the Procedure may unintentionally be interpreted such that the obligations related to network electrical safety are passed on to the Market Participants rather than Western Power holding that responsibility.

The combination of clauses 1.1.2, 3.1.2, 3.1.3 and 3.1.4 of the Procedure appear to suggest that Western Power may pass on the obligation for ensuring network safety at the time of connection to the Market Participant. Synergy seeks clarification of the noted sections to ensure Western Power remains responsible for network safety. Should clauses 3.1, 3.2 and 3.3 remain as drafted, Synergy suggests the Procedure clarify that Western Power is the body responsible for electrical safety of systems connecting to its network at the time of connection, removing any obligation, implied or otherwise, from the Market Participants in relation to network safety obligations on Western Power's behalf.

The current drafting of clause 3.3.2 of the Procedure would require Synergy to hold the accreditation information for all inverter makes and models connected to the SWIS indefinitely. Synergy considers that this obligation is overly burdensome and not appropriate to be applied to the Market Participant for non-contestable customers (being Synergy). Synergy understands that inverter accreditation is primarily considered as part of the Western Power Connection Process, and therefore suggests it would be more appropriate for Western Power to seek this information directly from the accreditation bodies, such as the Clean Energy Council, if required. Synergy suggests this should be amended to clarify which entity is responsible for holding the defined certification with proposed drafting outlined in Annexure 1.

### 2 Reference to Related Documents

The current proposed drafting includes references to various documents, including the Technical Requirements, Basic Embedded Generation Connection Technical Requirements (**BEGCTR**) and Western Australian Service and Installation Requirements (**WASIR**), that contain information related to the draft Procedure. Synergy requests clarity on the hierarchy of the documents should they differ.

Where the documents noted differ, Synergy understand the Procedure to prevail and would suggest the inclusion of the hierarchy of the related documents and a caveat clearly stating what documents the Procedure takes precedence over. Synergy would also suggest the use of more supporting information to provide industry with greater understanding of the implementation and impacts of the WEM Procedure.

### 3 Generation Limits with Relation to Injection Limits

Section 3.4 of the draft Procedure sets out the Generation Limits with relation to Injection Limits. Synergy considers section 3.4 of the procedure is unclear and requests clarification on the tables in section 3.4 so that Synergy may understand how network constraints will impact on the limits listed.

Synergy suggests Western Power consider amendments to the drafting which clarify how network constraints will be communicated to the Market Participant and any details of requirements or obligations for managing network constraints with respect to injection limits if they are to be lower than those outlined in Section 3 of the Procedure.

## 4 Common Smart Inverter Profile – Australia (CSIP-AUS) Requirement

Synergy suggests Western Power places a standardised remote disconnection communication protocol requirement in the Procedure and clearly sets out the base technical requirements for connection to the network for non-contestable customers. Whilst the shift to the use of CSIP-AUS base capability as the communication protocol for the emergency back stop mechanism for non-contestable customers has been flagged by EPWA in its Interoperability Statement, this procedure does not highlight its impact on standardisation of communications protocols. For transparency, visibility and ease of understanding for Industry, Synergy requests that CSIP-AUS V1.2 (TS5573) is specified as the requirement for injection limitation and remote disconnection capability for non-contestable customers, suggested drafting noted in Annexure 1.

Should this not be possible Synergy suggests at a minimum more clarity is provided to industry on the State Government led direction towards standardisation of remote communications protocols, to CSIP-AUS for non-contestable customers.

## 5 Broad References

Clause 3.2.2 of the Procedure includes a reference to section 2.2 of the Technical Rules, a document that is not noted as a related document, as such this reference may cause confusion. Synergy suggests the Technical Rules should be included as a related document under Clause 1.4. Please refer to the proposed drafting in Annexure 1.

Clause 3.3.1 references “statutory requirements” however it is unclear as to which requirements this wording is pointing to, outside those listed in the document. This ambiguity creates challenges for Market Participants as they may be unclear about all the requirements they must comply with as part of this Procedure. Where a Market Participant is non-compliant, it has an obligation to self-report these instances under the ESM Rules to the Economic Regulation Authority (ERA). Synergy suggests clause 3.3.1 is amended to clearly articulate all “statutory requirements” that must be met and eliminate the current ambiguity.

The Procedure regularly refers to the obligations of the Market Participant, however, under the current definition within the ESM Rules, DER retailers and installers are unlikely to be considered as Market Participants, and Synergy is the only party that would be deemed to be a Market Participant. Synergy considers this creates potential confusion and notes that it may not be clear to the DER retailer and installers industry that this Procedure ultimately also applies to them, due to the linear contracting model in the SWIS from Western Power to Synergy, then from Synergy to industry. Synergy suggests Western Power include an explanatory note that will be published advising industry that the Procedure provides Market Participants the ability to pass on these obligations to industry.

## CONCLUSION

Synergy requests careful consideration is given to its concerns, along with its drafting suggestions that address some of the points raised. Synergy thanks Western Power for its work to date on the Procedure under restricted timeframes and looks forward to continued consultation on further requirements and reform matters.

Yours sincerely

*Jamie Pickles*

**JAMIE PICKLES**  
**HEAD OF DER AND ENGINEERING**

## Annexure 1. Comments on WEM Procedure: Technical Requirements for Standard Small User Facilities

Synergy's comments on Western Powers proposed WEM Procedure																
#	Clause ref.	Classification	Issue	Suggestion												
1	2.2.1	Moderate	<p>The reference to the Standard Connection Service as defined in the WASIR does not provide readers with sufficient guidance to the referenced definition. This adds ambiguity to the required definition.</p> <p>Synergy understands that the explanatory notes within the Procedure will not be included in the published final version of the Procedure. Synergy suggests that this information is maintained within the procedure for guidance</p>	<p><b>2.2.1.</b></p> <p>A <b>Western Power Standard Connection Service</b> is defined in the WASIR, under Clause 1.2 and summarized in Table 2.1.</p> <p>Table 2.1. Western Power Standard Connection Service Characteristics</p> <table border="1"> <thead> <tr> <th>Connection Service</th> <th>Capacity (per Phase)</th> <th>Nominal voltage*</th> </tr> </thead> <tbody> <tr> <td>Single-phase</td> <td>63 A</td> <td>240 V</td> </tr> <tr> <td>Three-phase</td> <td>32 A</td> <td>415 V</td> </tr> <tr> <td>Split-phase</td> <td>32 A</td> <td>480 V (Phase to Phase)</td> </tr> </tbody> </table> <p>* The voltage range is changing in accordance with voltage limits published in the <i>Electricity Industry (Electricity System and Market) Regulations 2004</i> in Oct 2025, in section 55B. However, no modification of this is reflected here for consistency with the capacity (kVA) values used for rating of equipment and services. The voltage ranges are prescribed below:</p> <ul style="list-style-type: none"> <li>• Single-phase voltage range is 207 to 254 V, with a nominal voltage of 240 V</li> <li>• Three-phase voltage range is 360 V to 440V, with a nominal voltage of 415 V</li> </ul>	Connection Service	Capacity (per Phase)	Nominal voltage*	Single-phase	63 A	240 V	Three-phase	32 A	415 V	Split-phase	32 A	480 V (Phase to Phase)
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Synergy's comments on Western Powers proposed WEM Procedure				
#	Clause ref.	Classification	Issue	Suggestion
1	3.1.2	Clarification	<p>Under the Technical Rules clause 3.7.2, the Network Service Provider is required to undertake assessment of an IES performance against Technical Rules clause 2.2. It is unclear if this WEM Procedure requirement is intended to be met via Western Power under their obligations in clause 3.7.2 of the Technical Rules or pass the obligation over to the Market Participant.</p>	
2	3.1.3 3.1.4	Major	<p>The current drafting unintentionally requires Synergy to monitor the compliance under this clause. Synergy considers this monitoring to be related to network system security and the responsibility of the DSO. Synergy's suggested drafting clearly appoints the monitoring responsibility to Western Power.</p>	<p><b>3.1.3.</b> Where single-phase IES are used by themselves or with any combination of single-phase IES and/or three-phase IES on a three-phase Standard Connection Service, <b>the DSO will monitor</b> the maximum generation imbalance between any phases <b>which</b> must not exceed:</p> <ul style="list-style-type: none"> <li>(a) 1.5kVA for single source IES; or</li> <li>(b) 5kVA for an IES with a Battery Energy Storage System (<b>BESS</b>)</li> </ul> <p><b>3.1.4.</b> Where single-phase IES are used by themselves or with any combination of single-phase IES and/or two-phase IES on a split-phase Standard Connection Service, <b>the DSO will monitor</b> the maximum generation imbalance between phases <b>which</b> must not exceed:</p> <ul style="list-style-type: none"> <li>(a) 1.5 kVA for single energy source IES; or</li> <li>(b) 5 kVA for an IES with BESS.</li> </ul>

Synergy's comments on Western Powers proposed WEM Procedure				
#	Clause ref.	Classification	Issue	Suggestion
3	3.2.2	Clarification	The Technical Rules document flagged as a related document prior to it being referenced the WEM Procedure. Synergy suggests this is included under clause 1.4 so that readers are aware of the associated documentation.	
4	3.2.7 Explanatory Note (4)	Minor	Synergy understands the explanatory notes will be removed in the published version of the WEM Procedure.	Synergy suggests current Explanatory Note 4 is incorporated in the published WEM Procedure as it provides valuable information in an easily digestible form.
5	3.3.1	Clarification	Synergy suggests the inclusion of "statutory requirements" is vague and would like clarification as to whether this is referring to the items listed in the clause or if this is referring to an additional element. Should there be further requirements or documents that are being referenced, Synergy suggests they are clearly listed.	
6	3.3.2	Addition	Synergy suggests there should be clarity with regards to which entity is responsible for providing and holding the required certification. Synergy has proposed an inclusion to the clause which identifies the appropriate party to contact.	<p><b>3.3.2.</b></p> <p>The Standard Small User Facility must only use inverters that have a type-test report or type-test certificate from an independent and recognized certification body showing compliance of the inverter with AS/NZS 4777.2. Evidence of this must be supplied to <b>the Western Power, by the Accreditation Provider</b>, on request.</p>
7	3.5	Addition	Synergy suggests the standard form of communication should be legislated as a technical requirement under the WEM Procedure as it is a requirement for Industry and Market Participants to comply with the remote disconnect obligations.	<p><b>3.5. Communication Requirements</b></p> <p><b>3.5.1.</b> All IES connecting to Western Power's network for non-contestable customers must comply with TS5573.</p>