

**Bentley Office**

18 Brodie Hall Drive  
Technology Park  
Bentley WA 6102

PO Box 1066  
Bentley DC WA 6983

Telephone (08) 6310 1000  
Facsimile (08) 6310 1010  
[www.horizonpower.com.au](http://www.horizonpower.com.au)

14 May 2024

**Via email: [exemptions@accc.gov.au](mailto:exemptions@accc.gov.au)**

Naomi Menon  
Director, Competition Exemptions  
Australian Competition and Consumer Commission  
Level 27 135 King Street  
SYDNEY NSW 2000

Dear Ms Menon

**Pilbara ISOCo Ltd - Application for authorisation AA1000666**

Thank you for your letter dated 9 April 2024 inviting submissions from interested parties on Pilbara ISOCo Ltd's (**Pilbara ISOCo**) application for authorisation to engage in conduct related to coordination and system operation activities in the North-West Interconnected System (**NWIS**).

Regional Power Corporation trading as Horizon Power (**Horizon Power**) operates one of the three electricity networks that makes up the NWIS, which is centred around Karratha and Port Hedland. It is owned by the State of Western Australia and is a vertically integrated business that is also responsible for generation and retail. It is identified in Pilbara ISOCo's application as a participant in the proposed conduct.

Horizon Power supports Pilbara ISOCo's application and considers that there will be substantial public benefits from the proposed conduct. The proposed conduct relates to system security, outage coordination and technical connection standards. These issues need to be managed between the participants in the NWIS for it to operate as intended as an open access network.

Horizon Power considers that the grant of authorisation will deliver substantial benefits that will exceed any detriments. In particular, as identified in Pilbara ISOCo's application, Horizon Power considers that the proposed conduct will deliver substantially improved system security and reliability in the NWIS at lower cost. It will also improve third party access and competition, which is the purpose of the open access reforms to the NWIS. Horizon Power agrees that these benefits are likely to have flow on benefits for the region serviced by the NWIS as set out in Pilbara ISOCo's application.

Horizon Power does not consider that the authorisation of the conduct will lead to any public detriments given the protections provided by the suite of regulation governing the NWIS and supported by the conditions on the authorisation proposed by Pilbara ISOCo.

Please do not hesitate to contact Sandy Morgan on [REDACTED] if you wish to discuss this letter.

Regards



**Stephanie Unwin**  
**Chief Executive Officer**