ERA Framework and Approach to AA6 Review: City of Greater Geraldton

1. Executive Summary

The City of Greater Geraldton (the City) submits this document to the Economic Regulation Authority (ERA) in response to an invitation to provide submission to inform a determination of the services that will be regulated through the next Western Power Access Arrangement (AA6) and, from a broad perspective, the nature of the regulatory arrangements. This submission highlights the urgent need to improve regional power reliability, reduce Western Power response times for civil projects, prioritise extension of the 330 kV SWIS transmission line to Geraldton, modernise and coordinate local power generation systems, and improved street lighting services.

2. Acknowledgements

The City of Greater Geraldton appreciates this opportunity offered by the ERA to highlight power issues in the Mid West and regional Western Australia generally and the opportunity to consider improvements to the regulatory regime that would support improved service performance.

The City acknowledges that some matters contained within this submission will not fall strictly within the scope of the ERA AA6 review or the remit of Western Power. The City is uncertain as to the specific roles and responsibilities of the ERA, Western Power, Synergy, and PoweringWA. This lack of understanding on the City's part may result in community needs falling between demarcation gaps. To ensure that these concerns are highlighted, the City has chosen to include a broad range of power related issues. We trust this approach will help highlight areas where greater coordination and clearer delineation of responsibilities between agencies could deliver significant benefits to regional communities.

The City is also committed to reducing its carbon footprint. Initiatives undertaken include the development of a baseline carbon report, the purchase of hybrid vehicles, installation of solar systems on City facilities, implementation of a gas flaring system at the Meru Waste Management Facility, and development of a microgrid at Geraldton Airport to provide alternate power to the local emergency management facility during times of crisis. While these sustainability measures are critical, they must not come at the expense of regional power reliability. In 2025, living in regional Western Australia should not mean living with unreliable power—particularly in the Mid West, which is home to over 50,000 residents.

The City wishes to extend its sincere gratitude to Western Power staff who responded to recent Mid West power outages. These dedicated teams worked tirelessly, often for very long hours in challenging conditions, to restore electricity supply to our communities. Their efforts ensured essential services and critical infrastructure were brought back online as quickly as possible, minimising the impact on residents and businesses. Over many years, and through numerous emergencies, including the Cyclone Seroja, Western Power field crews have demonstrated professionalism, resilience, and commitment to regional communities. On behalf of the City and the

people of Greater Geraldton, we say thank you for your unwavering service and for continuing to support the Mid West.

The City also extends its appreciation to the officers who assisted in securing approvals for the Geraldton Microgrid Project. This collaborative effort has been instrumental in enabling a project that will significantly enhance regional resilience and emergency preparedness. The Geraldton Microgrid will provide an alternate power source for several essential facilities, including Geraldton Airport, the City's Field Operations Depot, the State Emergency Management Centre, and a public fuel outlet. These sites are vital to maintaining operational continuity during times of disaster, ensuring emergency services, transport, and community support can function when the main grid is compromised.

The City also wishes to express sincere gratitude to Western Power for installing backup generators in Mullewa. These generators have made a tangible difference to the community, particularly during the peak of summer when temperatures regularly exceed 40 degrees Celsius. Thanks to these generators, many outages have been avoided, ensuring essential community facilities remain operational. The City's pool has continued serving residents, and the Civic Centre has provided a safe, air-conditioned refuge during extreme heat events directly improving community wellbeing, safety, and resilience for locals during extreme heat events. This has had a direct and positive impact on community wellbeing, safety, and resilience.

The City of Greater Geraldton also acknowledges and appreciates the significant improvements Western Power has made in communications during emergency events. Recent major outages and weather events have demonstrated a more proactive, timely, and transparent approach to keeping local government and the community informed. This has greatly assisted the City in managing community expectations and coordinating local responses.

3. Background

The City of Greater Geraldton is the largest regional city north of Perth, located approximately 420 kilometres (about a 4.5-hour drive) from the Western Australian capital. With a population of over 42,000, Geraldton serves as the administrative, commercial, and cultural hub for the Mid West region. The City's Gross Regional Product (GRP) is estimated at over $2.5 billion, reflecting its diverse and robust economy.

Geraldton's economy is underpinned by mining, agriculture (notably grain and livestock), fishing, tourism, and renewable energy. The City is home to the Geraldton Port, a critical export gateway for the Mid West, handling millions of tonnes of grain, minerals, and general cargo annually. The port's strategic location supports the region's mining and agricultural sectors and is a key driver of local employment and investment.

The City's Strategic Community Plan (SCP) outlines a vision for sustainable growth, economic diversification, and enhanced liveability. Priorities include infrastructure upgrades, environmental stewardship, support for local business, and fostering a vibrant arts and events calendar. The plan emphasises Geraldton's role as a regional leader and its commitment to community wellbeing. The SCP maintains the themes highlighted in the 2017 Growth Plan and the 2023 Growth Plan.

Geraldton Airport is a vital regional gateway, welcoming over 150,000 passengers per year, with regular flights connecting to Perth and other regional centres. Tourism is a significant contributor to the local economy, with visitors drawn to the City's pristine beaches, maritime history, and unique attractions such as the Houtman Abrolhos Islands—a renowned marine park and eco-tourism destination located 60 kilometres offshore.

The City of Greater Geraldton encompasses approximately 10,000 square kilometre and includes the towns of Mullewa, Greenough and Walkaway, each with their own distinct heritage and community spirit. Geraldton is bordered by the Shires of Chapman Valley, Northampton, Morawa, Mingenew, and Irwin, fostering strong regional partnerships. The Abrolhos Islands, accessible from Geraldton, are famous for their coral reefs, fishing, birdlife, and the site of the Batavia shipwreck. Inland, Mullewa is celebrated for its wildflower displays and Indigenous heritage, while Walkaway is known for its wind farm and rural charm. Geraldton's strategic location, economic diversity, and high quality of life make it a key driver of growth and innovation in Western Australia's Mid West.

Geraldton is a strategic regional hub with ambitious growth targets outlined in the Geraldton Growth Plan. Reliable and scalable power infrastructure is essential to achieve these targets, attract industry, and ensure community resilience. This submission draws on ERA's AA6 Issues Paper, Western Power's AA5 progress reports, local government feedback, and comparative insights from other councils.

4. The Mid West's Exclusion from SWIS Transmission Plan Upgrade

The City of Greater Geraldton, along with the broader Mid West region, is deeply disappointed that the recently released South West Interconnected System (SWIS) Transmission Plan does not include an upgrade of the SWIS connection to Geraldton, Dongara, Chapman Valley, or Northampton. Despite the region's strategic importance and its world-class renewable energy resources, the current plan does not prioritise transmission upgrades for the Mid West, effectively signalling that the region will need to wait at least another decade before these critical infrastructure improvements are considered.

The State Government released the South West Interconnected System (SWIS) Transmission Plan in September 2025. The plan is a blueprint for upgrading and expanding WA's main electricity grid to support the clean energy transition, phase out coal generation by 2030, and unlock over 2 GW of new renewable energy generation capacity prior to 2030. Phase One (2025–2030) focuses on enabling coal retirement. Phase Two (2030–2035) supports larger scale industrial load growth, household demand increases, and further renewable and storage capacity. Phase Three (2035+) powers green export industries (hydrogen, ammonia), heavy electrification, and enables large new renewable projects, possibly beyond the current network footprint. Unfortunately, none of these aims, targets or phases mention an improvement in power reliability or any future for the Mid West.

This omission has far-reaching implications for the region's economic and social future. The Mid West is home to some of the best solar and wind resources in Australia, with the potential to generate large-scale renewable energy for both

domestic use and export. However, without a modern, high-capacity transmission connection to the SWIS, these resources remain largely untapped. This not only undermines Western Australia's broader decarbonisation and energy transition goals but also means the Mid West risks falling behind other regions that are able to capitalise on the clean energy economy.

The lack of transmission investment will stifle industrial growth in the region. Local industries including mining, agriculture, advanced manufacturing, and emerging green hydrogen projects require reliable, scalable power infrastructure to expand and compete. The absence of an upgrade to transmission infrastructure will discourage new investment, limit job creation, and constrain the region's ability to diversify its economy. Existing businesses may struggle to compete with counterparts in other parts of Western Australia that benefit from upgraded grid connections and more dependable energy supply.

Furthermore, the exclusion of Geraldton and the Mid West from the SWIS transmission upgrade plan is a missed opportunity to unlock economic growth, support local communities, and position Western Australia as a leader in renewable energy. The region's port infrastructure, skilled workforce, and proximity to Asian markets make it an ideal location for large-scale renewable energy projects and associated industries. Yet, without the necessary transmission backbone, these opportunities will be lost to other regions that are better connected.

The decision not to proceed with the extension of the 330 kV transmission cable will significantly constrain the development potential of the Oakajee Industrial Estate. This estate is a cornerstone for future industrial growth in the Mid West region, and reliable high-voltage power is essential to attract and sustain major projects. Without this infrastructure, Geraldton risks losing competitive advantage for large-scale industry, which could otherwise deliver substantial economic benefits and employment opportunities.

Furthermore, Geraldton's future water security is directly linked to energy availability. The next viable water source for the region is desalination, a process that requires considerable electrical power. The absence of the 330kV extension jeopardises the feasibility of desalination, leaving the community vulnerable to water shortages. Current water supplies can only support approximately 2,000 additional houses, excluding any new major industrial developments. This limitation underscores the urgent need for investment in transmission infrastructure to ensure both industrial expansion and long-term water resilience.

The City of Greater Geraldton urges the State Government and the ERA to reconsider the region's needs and prioritise transmission upgrades that will enable the Mid West to reach its full potential. Ensuring that Geraldton, Dongara, Chapman Valley, Northampton, and surrounding communities are included in the next phase of SWIS upgrades is essential for the region's future prosperity and for Western Australia's ambition to become a renewable energy powerhouse.

5. Power Demand, Supply Constraints, and Growth Limitations

The City of Greater Geraldton and the broader Mid West region are experiencing significant constraints in electricity supply that are already limiting economic growth and investment. Geraldton's current demand profile includes residential, commercial, and industrial loads, with major consumers such as the Mid West Ports Authority (MWPA) and large industrial operators like DIAB (Diab Engineering Pty Ltd) requiring substantial and reliable power to maintain operations. These industries, along with emerging projects, are critical to the region's economic future, yet they face ongoing challenges due to limited transmission capacity and frequent outages.

Despite these constraints, the State has advised that upgrading the existing power infrastructure from Three Springs to Geraldton is not immediately necessary because "additional supply capacity is not needed." This position is deeply frustrating for the City and local industry, as it does not reflect the reality on the ground. Businesses are already being forced to delay or abandon projects due to power limitations, and new developments are running on temporary generators while waiting for grid connections. These delays undermine investor confidence and regional competitiveness.

The situation is compounded by the fact that the next major water source for the region is expected to be a desalination plant, which will require significant additional power. Without transmission upgrades, this essential infrastructure will further strain an already fragile system. Major industry projects are already being lost to other regions because of these constraints. Geraldton and the Mid West have world class renewable resources and strategic advantages for advanced manufacturing, yet opportunities such as green steel production and large-scale hydrogen projects cannot proceed without adequate transmission capacity. The proposed Vestas Mid West Wind Farm, with a planned capacity of over 1,000 MW, is contingent on the extension of the 330 kV backbone from Three Springs to their site. Similarly, Oakajee's industrial precinct and associated green hydrogen and green steel projects require high capacity transmission to connect to the South West Interconnected System (SWIS). Without these upgrades, the Mid West risks missing out on billions of dollars in investment and thousands of jobs.

The City strongly urges the ERA, PoweringWA, Synergy and Western Power to recognise that the current limitations are not hypothetical. They are actively constraining growth today. The extension of the 330 kV line and associated reinforcements must be prioritised to unlock the region's potential, support critical infrastructure such as desalination, and enable transformative projects in renewable energy and advanced manufacturing. Reliable power is the cornerstone of growth; without it, the Mid West cannot deliver the jobs, exports, and decarbonisation outcomes that benefit all Western Australians.

6. Regional Power Reliability

Regional reliability in the Mid West is at crisis level. Western Power's AA5 Second Annual Progress Report shows rural long feeders averaged 851.9 minutes SAIDI in 2023/24, nearly three times the AA5 benchmark of 290 minutes. Communities at the end of the grid remain highly vulnerable to outages caused by aging infrastructure, extreme weather, and limited redundancy. The reliance on generation sources over 400 km away has repeatedly failed during storms and bushfires, exposing systemic shortcomings.

Table 1: Reliability Performance Data (2023/24)

Feeder Type	AA5 Target (Minutes)	2023/24 Actuals (Minutes)
CBD	13.7	48
Urban	123.8	136.4
Rural Short	202.5	221.9
Rural Long	290	851.9

Source: Western Power AA5 Second Annual Progress Report (July 2025)

With the knowledge that the upgrade of the SWIS 330 kV line to Geraldton will not occur for at least a further ten years, the region seeks the development of a coordinated and well thought out Mid West Energy Resilience Plan to review current local power generation equipment with a mind to developing them further to provide a secure backup energy resource for the region. The Mid West has a number of power generation systems. These include:

- The Mungarra Power Station (112MW).
- The Greenough River Solar Farm (40MW).
- The Walkaway (Alinta) Wind Farm (87MW).
- The Tesla Corporation (10MW).

The Mungarra Power Station, located about 50 km southeast of Geraldton, is a natural gas-fired facility with a nameplate capacity of 112 MW. It consists of three gas turbines, each producing roughly 37–38 MW and was commissioned in 1990. It provides backup power supply for Geraldton and surrounding areas. The station can "island" the Geraldton region from the main grid, reducing power outage timeframes. It also plays a role in providing voltage support. Maintenance of this plant remotely controlled from Perth is undertaken by Synergy and Western Power.

At the time of Cyclone Seroja, the City was advised that the Mungarra power plant was being decommissioned. It was only fortuitous that one of the three generators was able to be started and hence the power outage duration was reduced. In the case of the recent outage due to lightning, the City was advised that the Mungarra plant was closed for maintenance.

The Greenough River Solar Farm is located approximately 50km southeast of Geraldton and has a 40MW capacity. It is owned by Bright Energy Investments and comprises a flat panel PV system with over 150,000 modules. The City's understanding is that this system does not supply Geraldton because of the line restrictions and cannot be used as an 'island' in times of connection failure.

The Walkaway (Alinta) Wind Farm is located approximately 30km southeast of Geraldton and comprises 53 Vestas V82 turbines. The City's understanding is that this system does not supply Geraldton because of the line restrictions and cannot be used as an 'island' in times of connection failure.

Tesla Corporation Pty Ltd has a diesel generator with battery storage adjacent to Geraldton Airport since 2012. They are a WA-based company that operates

distributed power stations across the South West Interconnected System (SWIS). In January 2025, received a WA Clean Energy Future Fund grant to convert the 10MW diesel generator into a battery storage system.

The City of Greater Geraldton strongly supports initiatives that enhance local resilience through renewable integration and advanced storage technologies. The City would request that a report be conducted to investigate the cost associated with upgrading and modernising these local power plants to enable them to become 'islands' and to provide power when the SWIS fails.

The City strongly supports the continued deployment of independent power plant such systems mentioned above and encourage Western Power and the ERA to consider installing similar backup solutions in other nearby shire towns located at the end of the grid. These communities are often the most vulnerable to outages and would greatly benefit from enhanced local reliability measures.

7. Reducing Western Power's Response Times

Timely connections are essential for development. Despite process improvements, average queuing times for large projects remain over 30 months. Distribution connections for commercial and industrial developments often take 12–15 months.

Table 2: Connection Times for Major Projects

Stage	September 2024 (Months)	March 2025 (Months)
Enquiry	11.8	11.0
Initiation	8.0	6.0
Scoping	9.3	7.8
Planning	7.8	6.4
Total	**36.9**	**31.2**

Source: Western Power AA5 Second Annual Progress Report (July 2025)

These timeframes are at odds with the State government's requirements to accelerate development in the regions including housing. Much media attention and legislative changes have focused on local government planning departments when in reality this attention should be placed on these timeframes.

Historically, when the City applied to the State Agencies for approvals (Main Roads, Water Corp, Western Power), the response time was generally six months, and they were all roughly in alignment. Unfortunately, Western Power timeframes are much longer. This has resulted in the City project timeframes far exceeding the previously allocated two year window which in some cases jeopardises grant funded projects. Specific examples can be provided upon request of the timeframes on recent city projects. This experience is in line with local developers who express similar sentiment.

8. Project Communications

Western Power has established an online portal intended to provide customers with timely updates on the status of their projects. While this is a positive step, the portal's functionality is limited. It only displays the current phase of a project, without providing any indication of expected timelines for Western Power to advance the project to the next stage or to completion. This lack of forward facing information such as timeframes and additional information required makes it difficult for the City to plan, coordinate, and deliver important local level infrastructure such as road safety projects.

The City has experienced significant delays in receiving responses to queries submitted. For example, when a City officer left the organisation, Western Power was notified that the contact email for the portal needed to be updated. The officer received a response indicating that this administrative change would take 16 weeks to process, which is unreasonably long for a simple contact information update.

There is also a concerning pattern where, if the City questions the status or progress of a project, Western Power responds with a request for further information or clarification. After the City provides the requested information, communication often goes quiet again, with no substantive update or progress report. This cycle can lead to frustration and the perception that queries are being deflected rather than resolved.

The City understands that Western Power have made improvements to timeframes for the private development industry where developers can get consultants to undertake the required electrical designs using a Western Power pre-approved consultant's list. This opportunity should be extended to the local government sector as it has also been indicated that local government sector projects are not considered a high priority unless they are funded through the road's Blackspot program.

9. Street Lighting

9.1. Financial Burden on Local Government

The City of Greater Geraldton is charged approximately $1.1 million per annum for street lighting services. This is a significant and growing cost for the community, especially as energy and maintenance tariffs continue to rise. The City's experience is consistent with other Western Australian councils which also faces substantial annual outlays for street lighting and related infrastructure. The annual streetlighting tariff increases are also well above the Perth CPI which further exacerbates cost of living issues for regional Western Australia.

The City of Greater Geraldton is unclear on the regulative framework associated with streetlighting services. Councils currently pay for the service whether the lights are working or not and must undertake and fund their own night inspection of streetlights as Western Power will not undertake proactive inspections. Faulty streetlights must be reported by councils or residents, and repairs take weeks, especially for cable faults for which there is currently no reporting requirements for Western Power.

9.2. LED Rollout and Communication

The rollout of LED luminaires and smart lighting technology presents an opportunity for councils to reduce costs and improve environmental outcomes. However, communication from Western Power regarding the rollout schedule, technical standards, and opportunities for collaboration has been inconsistent. Councils have

expressed a desire for more proactive engagement so they can align local projects and funding with Western Power's program, and potentially leverage the rollout to achieve Safe, Productive, and Technologically Enabled Design (CPTED) goals.

10. Conclusion and Recommendations

In conclusion, the City would like to suggest the following:

10.1. Mid West Specific Matters:

- Review the recently announce PoweringWA SWIS plan and include the power reliability needs of the Mid West.
- Prioritise the SWIS 330 kV transmission extension from Three Springs to Geraldton, with a clear timeline and funding commitment.
- Complete a Mid West Energy Resilience Plan that considers modernising and upgrading the existing local power generation assets so they can deliver relief in times of disaster.
- Review the current and medium term energy needs of the Mid West to highlight current energy shortages and emerging shortages.
- Align network planning and investment with Geraldton's Growth Plan and MWDC regional development strategies.
- Determine why a scheduled maintenance activity was undertaken at the Mungarra Power plant in summer rendering it useless during recent Bushfire emergencies.

10.2. Regional Reliability:

- Accelerate investment in regional power generation solutions with an aim to improve regional reliability (Battery Energy Storage systems, microgrids, generators etc).
- Require reliability reporting at the LGA level.
- Review maintenance expenditure on regional back up power plants and the timing of such maintenance be reported with the information to be made publicly available.

10.3. Civil Project designs, connections and timeframes:

- Strengthen incentives and accountability mechanisms for Western Power to significantly reduce response times.
- Expand self-service options to allow regional local governments to accelerate the delivery of critical infrastructure.
- Monitor and publicly report connection times for all customer categories.
- Western Power project portal to be upgraded to include estimated timelines for each project phase, clear escalation pathways, and a log of all communications and actions taken (Administrative changes, such as updating contact details, should be actioned within industry-standard timeframes (within 1–2 weeks)).
- Establish clear accountability for project communications, with named contacts and service standards for response times and issue resolution.

10.4. Streetlights:

- The ERA should review the regulatory framework to clarify the roles of Synergy, Western Power with respect to streetlight billing payments and inspections.
- Introduce mechanisms to ensure councils only pay for operational street lights, with automatic tariff adjustments for outages.
- Require Western Power to conduct and report on regular inspections or fund local government inspections as part of the service.
- Support collaboration between Western Power and local governments to achieve broader community safety and technology goals through the lighting upgrade program.

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