



Enel X Australia Pty Ltd
Level 34, 140 William Street
Melbourne, Victoria 3000
Australia
T +61-3-8643-5900
www.enelx.com/au/

EPWA

Submitted via email: energymarkets@dmirs.wa.gov.au

8 8 July 2024

Dear EPWA

RE: Miscellaneous Amendments No. 3 WEM Amending Rules – Exposure Draft

Thank you for the opportunity to provide feedback on the Exposure Draft of the Miscellaneous Amendments No. 3 WEM Amending Rules.

Enel X works with commercial and industrial energy users to develop demand-side flexibility and offer it into capacity, energy and ancillary services markets worldwide, as well as to network businesses. In Western Australia, Enel X built a 60 MW portfolio of supplementary reserve capacity for 2023-24, and have recently a 120 MW of flexible demand capacity under the NCESS framework coming online for 2024-26.

This submission sets out our feedback on the consultation paper. It focuses on those changes relevant to demand side programmes. In summary:

- We **do not support** the proposed publication requirements associated with NCESS contracts in Clause 3.11B.15. The level of information which EPWA is proposing to publish is commercially sensitive and should remain confidential unless there is a tangible benefit to other market participants. We believe the total aggregated cost of the program is relevant to market participants but individual contracts are not. RERT is published at an aggregated level and there is no additional benefit for information to be given at a disaggregated level.
- We **support** the proposed amendment to Clause 2.29.5AC to increase the injection cap to 10MW per TNI as it supports the stated goal of giving aggregators greater flexibility on how they meet their reserve capacity obligations.
- We **support** the proposed amendment to clause 2.29.5AE to prevent a DSP from registering at a TNI which AEMO has deemed to be 'congested' as it has been proposed in conjunction with the new clause 4.15.16A (**which we support**) AEMO is required to publish congested TNIs prior to application for CRC.
- We **support** clause 4.26.1AA which introduces the Peak DSP Delivery Shortfall quantity and the changes to the methodology of the Reserve Capacity Deficit calculation in clauses 4.26.1A(a)(ii)(5) and 4.26.4(a)(ii)(4)
- We **support** the proposed amendments to clause 7.4.47 which allows the registration of a facility at the metering point in clause 2.29.1B as opposed to the connection points and we support the associated definition of connection point and metering point as proposed. These changes are positive and would allow for embedded networks to operate behind a single connection point (parent NMI) as facilities in the WEM following AEMO approval.

We would like to thank EPWA for conducting such a thorough and consultative process. We look forward to continuing to work with EPWA on other ways in which the demand side can play a greater role in delivering security and reliability in the WEM.

If you have any questions or would like to discuss this submission further, please contact me.

Regards

Carl Hutchinson, Country Manager, ANZ
carl.hutchinson@enel.com

