

TO/

Energy Policy WA
Level 1, 66 Georges Terrace
Perth WA 6000

July 8, 2024

To Whom It May Concern,

RE: Letter of Support Energy Policy WA

Firm Power Pty Ltd is pleased to offer our support to Energy Policy WA for the recently published draft of the WEM amending rules (Miscellaneous Amendments No.3). Firm Power has reviewed the proposed changes, particularly the revision of clause 2.29.1B and the redefinition of a Facility by its Metering Point; rather than its connection point.

As a proponent of large-scale storage within the Wholesale Energy Market (WEM), Firm Power endorses the proposed amendments. We believe that these changes will provide greater flexibility when connecting storage assets to the South West Interconnected System (SWIS). This flexibility will enhance the commercial viability of projects within the SWIS by reducing connection costs via the use of a single point of connection with multiple metering points.

However, Firm Power would like to seek clarification as to how separately metered, co-located solar and storage systems behind a connection point, would be treated for MLF calculation purposes. Under this configuration a BESS being charged by the solar behind the connection point would not generate losses from the viewpoint of the WEM, which should be reflected in MLF calculation so that the BESS or Solar is not unfairly disadvantaged.

Firm Power is enthusiastic about participating in the WEM and supports any policy modifications that enhance the viability of storage projects in Western Australia. We look forward to continued collaboration with Energy Policy WA in the future.

Sincerely,



Nick Rose
Chief Executive Officer
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