Minutes

Meeting Title:	Market Advisory Committee (MAC)
Date:	11 October 2022
Time:	9:00am –11:04am
Location:	Videoconference (Microsoft Teams)

Attendees	Class	Comment
Sally McMahon	Chair	
Dean Sharafi	Australian Energy Market Operator (AEMO)	
Martin Maticka	AEMO	
Aditi Varma	Network Operator	Proxy for Zahra Jabiri
Genevieve Teo	Synergy	
Christopher Alexander	Small-Use Consumer Representative	
Noel Schubert	Small-Use Consumer Representative	
Geoff Gaston	Market Customer	
Patrick Peake	Market Customer	
Timothy Edwards	Market Customer	
Wendy Ng	Market Generator	
Jacinda Papps	Market Generator	
Rebecca White	Market Generator	
Paul Arias	Market Generator	
Geoff Down	Contestable Customer	Proxy for Peter Huxtable
Noel Ryan	Observer appointed by the Minister	
Rajat Sarawat	Observer appointed by the Economic Regulation Authority (ERA)	

Also in Attendance	From	Comment
Dora Guzeleva	MAC Secretariat	Observer
Laura Koziol	MAC Secretariat	Observer
Shelley Worthington	MAC Secretariat	Observer
Grant Draper	Marsden Jacob Associates (MJA)	Presenter

Also in Attendance	From	Comment
Peter McKenzie	MJA	Observer

Apologies	From	Comment

Item Subject Action

1 Welcome

The Chair opened the meeting at 9:00am with an Acknowledgement of Country.

The Chair declared that she had been appointed as a Commissioner to the Australian Energy Market Commission advising there were no perceived conflicts of interest and that she can continue in the role of independent Chair of the MAC.

The Chair advised that her position as expert panel member on the WA Electricity Review Board remains current.

2 Meeting Apologies/Attendance

The Chair noted the attendance and apologies as listed above.

3 Minutes of Meeting 2022_08_23

The MAC accepted the minutes of the 23 August 2022 meeting as a true and accurate record of the meeting.

Action: The MAC Secretariat to publish the minutes of the MAC 23 August 2022 MAC meeting on the Coordinator's Website Secretariat as final.

4 Action Items

The Chair noted there were no open action items.

5 Market Development Forward Work Program

The paper was taken as read and the Chair noted that the updates in red were to be reviewed and discussed, as follows:

The Reserve Capacity Mechanism (RCM) Review

To be discussed under agenda item 6(b).

The Cost Allocation Review (CAR)

To be discussed under agenda item 6(c).

Future Reviews

To be discussed under agenda item 8.

6 Update on Working Groups

(a) AEMO Procedure Change Working Group (APCWG)

The paper was taken as read. Mr Maticka confirmed that there was no AEMO procedure change activity since the previous MAC meeting.

(b) RCM Review Working Group (RCMRWG)

The papers for agenda item 6(b) were taken as read.

Members noted that the item provides an update on the progress and next steps for the RCM Review, including the publication of the Consultation Paper and submissions received, and an updated timetable that captures some of the issues that have been identified and are still to be resolved.

Ms Guzeleva noted that 12 submission were received indicating general support and acknowledging the high importance of the review. Generally the submissions:

- indicated a very high level of support for the addition of the flexibility product to the RCM;
- provided a number of comments on the approach to allocate Certified Reserve Capacity to intermittent generators, and in particular:
 - raised concern that the three identified methods may lead to volatility of outcomes; and
 - sought further investigation of the method proposed by Collgar, without amendments.

Ms Guzeleva advised that, following the closure of submissions, a meeting was held between herself, the Coordinator of Energy (CoE), the Australian Energy Council (AEC) and the AEC's local members. The AEC considered that the amended Collgar method would lead to unacceptable volatility from an investment point of view. As a result of those discussions and the submissions to the Consultation Paper, Ms Guzeleva noted that:

- work has been replanned to allow for further analysis around the Delta Method, the Collgar method and the amended Collgar method;
- the key objective is to demonstrate to the Government that any selected method does not compromise reliability; and
- the next steps will look at options to reduce volatility.

Mr Alexander sought to clarify the anticipated delay to the original schedule, noting the urgency around some of the system security issues and asked whether international best practice in regards to allocating Capacity Credits had been considered.

- Ms Guzeleva noted that:
 - The delay amounted to two additional months, accounting for the Christmas break.
 - There was no immediate security issue per se because Market Participants have already received Capacity Credits, which apply until 1 October 2023, and there was concern that the current method for assigning capacity credits is quite conservative (i.e. the current

- method has been widely criticized as not sufficiently rewarding intermittent generators for what they can provide to the system in terms of reliability).
- With regard to best practice, Ms Guzeleva noted there is a requirement under the rules to reassess the Relevant Level Methodology (RLM) every three years. Studies and consultations have been undertaken and the result was that the Effective Load Carrying Capability (ELCC) and the Delta Method have been used internationally and appear to be well recognized. However, there may be some differences in the WEM that make results from the Delta Method more volatile, which may not be able to be fully addressed without compromising reliability.
- Ms Guzeleva noted that reliability is paramount and that, while managing volatility is also important for investment, the volatility in the Delta Method is largely caused by volatility in the output of intermittent generators.

Ms Guzeleva noted that submissions also commented on the 14-hour fuel requirement, including how that fuel requirement is applied in practice by AEMO and that it can be better aligned with its original intent.

Ms Guzeleva noted the proposals in the Consultation Paper on how to cover a future availability duration gap (the three Capability Classes replacing the current Availability Classes) attracted a lot of attention, with responses indicating that the five-year fixed availability duration requirement for Class 2 is not enough. As a result, modelling would be undertaken to determine the impact on costs and reliability in the market of five, seven and ten year durations.

- Mr Arias noted that in the meeting papers the schedule had been pushed out and that there were quite a few actions for the implementation of the high emissions technology penalties, and asked if there was any feedback that can be circulated to the MAC or industry.
 - Ms Guzeleva noted that the Draft Statement of Policy Principles: Penalties for High Emission Technologies was discussed at the 9 August 2022 MAC meeting, recorded in the minutes of that meeting, and that the industry views are quite clear.
 - The policy advice to the CoE from the MAC had been presented and factored into a proposal for an amended statement of policy principles that has been submitted to the Minister.
 - The Minister has not provided a final statement of policy principles, but EPWA has commenced work on options

for the penalty arrangements, which will be brought to the December 2022 MAC meeting.

(c) CAR Working Group (CARWG)

The paper was taken as read.

Ms Guzeleva noted that allocation of Market Fees has dominated the discussion at some of the CARWG meetings and that she was seeking to close off that issue today, and to also give an update on the very complex matter of how regulation costs are recovered elsewhere and the methods that the CARWG is looking at.

Ms Guzeleva noted that Market Fees are, in the scheme of things, a very small amount and will hopefully get smaller in the future but that regulation costs are going to increase, so sending signals around those latter costs is very important and should be the future focus of this review.

Mr Draper focused the discussion on the recommendations for each service (slides 5-7). Those services that were agreed by the MAC as lower priority were not covered in detail but recommendations were included on how they should be treated going forward.

- Mr Schubert noted, with regard to the Contingency Reserve Raise, that there should be a mechanism or incentive for generators to look at how they configure on the network and divide their circuits so that a Credible Contingency is lower.
- Ms Guzeleva agreed that, at the moment, there is not a signal for people to do the right thing.

Allocation of Market Fees

Mr Draper noted that the cost allocation mechanism for Market Fees is more to do with equity than to providing price signals to change behaviour to potentially reduce future costs, and that Market Fees make up a very small percentage of total costs.

Mr Draper acknowledged that with increasing amount of Distributed Energy Resources (**DER**) there were going to be changes in terms of how much of these costs is recovered from different types of customers. He noted that, in order to accurately allocate those costs, there would need to be a measure, such as Individual Reserve Capacity Requirements (**IRCR**), to ensure equitable recovery of costs from retailers whose customers have a high proportion of DER.

Mr Draper noted that the Hybrid method was recommended to CARWG at its meeting on 27 September 2022 and the views of the CARWG was mixed. Some generators wanted to understand further how the AEMO's effort/costs were split and why activities related to generators account for the majority of the costs.

Mr Draper indicated that the CARWG generally accepted that Market Fees are really about cost recovery and that the Hybrid method approach would lead to a fairer allocation of costs, with the introduction of IRCR as part of the cost recovery mechanism, and noted that merchant peaking generators would also start to pay a fairer contribution to Market Fees.

Mr Draper noted that it was important to consider the cost to develop and implement changes to the Market Fee allocation methods because it would be inappropriate to incur costs without tangible benefits to the market, and that further work was required on the treatment of storage to make sure there was no double counting.

Mr Draper noted that some generators were in favour of allocating all Market Fees to final customers, and that there were some legitimate arguments for why that should occur, but also noted that customers cannot really respond to the charges and the fees will not affect their decisions. Other generators supported the existing cost allocation method, and the small customer representative supported the WEM Hybrid method, which indicates that there is a diverse range of opinions on this topic.

- Ms Guzeleva noted that the CARWG discussions went back to the guiding principles of the review, and that there was no evidence of any tangible benefits to changing the current allocation method. She also noted that making changes would incur costs for AEMO, including in the settlement systems, and that participants will incur costs because they will need to change their downstream contracts and systems.
- Ms Guzeleva noted that the cost of Market Fees is relatively small and, in the current environment, there was a question whether maintaining focus on this issue is of any benefit to the WEM. Ms Guzeleva noted that she was looking for the MAC to close off the issue of Market Fees noting that the MAC work program inherited this issue with the transfer of the market governance function to the CoE which was the reason for it being in scope.
- The Chair noted that the small use customer representative supported the WEM Hybrid method and sought further information on why that was the case. She also noted that, unless there is a benefit that outweighs the cost of implementation, it might be difficult to support a change from the current method.
 - Mr Alexander indicated that there would be a concern if additional costs are passed through to consumers when they are not in a position to manage that.

- Mr Schubert noted that he supported the Hybrid method providing that the benefits are greater than the costs, but otherwise would prefer to keep the current WEM method.
- Mrs Papps supported retaining the current WEM method and noted that Alinta's rough estimate to implement the Hybrid method would be around \$100,000 to make required changes to the billing and reconciliation tools plus legal costs for changing contracts.
- Mr Peake noted that a consequence of increasing the fees
 of a plant that is running at zero capacity factor is that it
 becomes the benchmark plant, and one would assume that
 these fees would roll into the Benchmark Reserve Capacity
 Price (BRCP), which could lead to substantial costs to the
 community.
 - Mr Draper agreed and noted that merchant peaking generators would have no way to pass the cost through to retailers and customers, and would have to wear these costs, so the BRCP would need to be adjusted to enable them to recover these costs.
- Mr Gaston noted that this review was initially about equity, not efficiency, and there is no logic in trying to get more efficient or to avoid these costs. Mr Gaston supported the Hybrid method because this review came out of the fact that people with DER are avoiding or reducing their fees and that these fees are then passed to customers that do not have DER this is an equity issue.
 - Mr Draper agreed that the Hybrid method is fairer from the perspective that it addresses the DER issue.
- Ms White added that the load side under the Hybrid method is allocated on IRCR, which is not equivalent to allocating to generators based on the full sent out/ nameplate capacity, and questioned whether the method applied to the loads need to be matched for generators.
 - Ms Guzeleva noted that introducing IRCR relates to Mr Gaston's point in capturing photovoltaics (PVs) in particular. This was chosen as one way to charge consumers on the basis of their contribution to the peak, which is not when PVs normally export their energy, to reflect the fact that they avoid some of the costs during the rest of the day.
 - Mr Gaston agreed with Ms White's comment and noted that, while IRCR seems to be the most reasonable way of doing this, IRCR probably also needs a review, adding that this is being considered in the RCM Review.

The Chair sought the MAC's views noting there appeared to be some support for retaining the current WEM method because the costs of implementing the Hybrid method are expected to outweigh the benefits, as there may be equity benefits but potentially no efficiency benefits resulting from this method.

- Mr Schubert agreed that this was the case.
- Mr Peake also agreed, noting there was a need to consider whether equity continues to get worse as the market continues to develop and change.
- Mrs Papps agreed and noted that, given there are only limited tangible benefits at this stage, and the current work streams and overall workload, there will be a benefit of pausing this issue while the issue of IRCR is dealt within the RCM Review.
- Ms Alexander supported Mrs Papps comment.

The Chair asked Ms Guzeleva and Mr Draper how to close the issue, noting there was a preference to not continue to incur effort unless it was considered that there are likely to be benefits that have not been currently identified that outweigh the costs.

Ms Guzeleva noted that there will always be winners and losers from changing a cost allocation method and that this would boil down to a cost-benefit analysis, and since the Market Fees are so small, she considered that there is no justification for continuing discussion of Market Fees.

The Chair noted that the consultation paper will propose to retain the current WEM method because, although there may be some benefits to the Hybrid method from an equity perspective, the benefits are not expected to outweigh the costs. EPWA can then consider responses to the consultation paper to determine if/when further work needs to be done.

Allocation of Frequency Regulation Costs

Mr Draper noted that analysis had been provided to the CARWG on the current NEM Causer-Pays method and the Tolerance Method (slides 21 and 22) and that both methods provide some signals to generation for forecast accuracy and to better control their generation. Mr Draper also noted that the CARWG discussed consistency with what is happening within the NEM, as there would be efficiency benefits for AEMO if a cost allocation methodology similar to the NEM's was implemented in the WEM.

Mr Draper noted that the New NEM Causer-Pays method, that is currently out for consultation and will be implemented in the NEM, was raised with the CARWG but that participants needed further information to understand what method.

- Ms Guzeleva noted that further work was to be done but that this was very important because there is currently no signal for participants to reduce their volatility to reduce regulation costs.
- Ms Guzeleva noted that the current NEM Causer-Pays
 method is extremely complex and that a session was being
 arranged for AEMO to explain the new NEM Causer Pays
 method to the CARWG. Ms Guzeleva noted that it is
 important that what is implemented is simplified to the extent
 practicable.

The Chair noted the benefit in doing this further work and that it was largely supported by the CARWG.

- Ms Varma asked what timeframes were been considered, noting that AEMO would probably be already very busy working on the new settlement systems.
 - Ms Guzeleva replied that it was not intended to have a method fully developed before the new market start in October 2023. Any new method would need to be carefully managed to not put any additional pressure on the implementation of the new market. She also noted that AEMO had issued a paper in September 2021 that supported a method that reduces volatility and costs for regulation, and while there was reason to have concerns about implementation pressures, AEMO has expressed support for this to happen as a priority.
- Mrs Papps supported doing further work and noted that the NEM rule change will take about 3 years to implement, and if a similar time is taken for the WEM, this might overlap with the implementation of 5 minute settlement. Mrs Papps indicated that, given the current workload, it is important to align all these things to make sure the focus is on the issues that are most valuable to the market.
 - o Ms Guzeleva agreed with Mrs Papps regarding the need to carefully consider timing of implementation, and noted that the planning for this piece of work has not yet been done, as it requires the policy before considering timeframes and synergies with other work streams. Ms Guzeleva noted that Frequency Regulation is very important when moving to the new net zero targets, because significant regulation costs could be incurred.

The Chair noted the support for further work on the new NEM Causer-Pays Method would be beneficial and should start, but that the timeframes of introducing this change need to be considered alongside the greater body of work.

 Ms White added that it was important to keep investigating allocation of Frequency Regulation costs, and asked if there was consideration to delaying 5 minutes settlement, noting the perverse outcomes that are obviously occurring in the interim two years and any decision to delay the 5 minute settlement is very material.

The Chair noted that there was general support from the MAC to do further work on the new NEM Causer-Pays method on the basis that there are expected to be benefits from implementing that method.

Allocation of Contingency Reserve Raise Costs

Mr Draper noted that there is a potential issue of attributing too much Contingency Reserve Raise cost to a facility depending on how the facility is configured, noting the configuration of Collgar.

- Ms Guzeleva noted that this was a very limited issue in scope and should not be difficult to address, bearing in mind the impact on AEMO's current implementation work.
- Mrs Papps tentatively supported the direction discussed by the CARWG but would like a more detailed definition of Credible Contingencies to be inserted in a procedure to understand that and what it means for this recommendation.

Allocation of Contingency Reserve Lower Costs

Mr Draper noted the need to send a price signal for Contingency Reserve Lower Costs and the recommendation to apply a modified runway method to incentivise participants to consider options to reduce the size of the credible risk for large facilities.

- Ms Guzeleva noted that it was an important issue to look at and that it is worth including a recommendation on this in the consultation paper, and that MAC support was being sought to state that this issue needs to be addressed.
- Mrs Papps noted that Alinta would need to see a cost-benefit analysis as part of that consultation paper given that the runway method is quite complex.

The Chair summarised that there was general support from the CARWG to do further work and to include a recommendation in the consultation paper. She also noted that there are expected benefits from such an approach but that the costs of implementing any change should also be considered. This should look at not just the impact on the fees to different players, but also how the recommended approaches stack up against the principles for the review.

- Ms Guzeleva noted that the consultation paper would examine each option against the principles and make a recommendation.
- Mr Sharafi noted that there was also a system security issue to consider, not just the cost.

The Chair noted that this was an important theme to identify in the next steps in the consultation paper, including the resilience of some of these methods to future circumstances.

 Ms Guzeleva agreed noting that sustainability is one of the principles of the review.

Allocation of other Essential System Services (ESS) Costs

Mr Draper noted that allocation of other ESS costs had not been discussed in great detail by the CARWG, and that slides 41-43 proposed how this would be dealt with.

 Ms Guzeleva noted that allocation of other ESS costs was previously presented at the June 2022 MAC meeting, and that all of those issues were agreed to be low priority, so the CARWG was not spending a lot of time on them.

7 Rule Changes

(a) Overview of Rule Change Proposals

The paper was taken as read.

- Mr Edwards noted that with the mandatory Generator
 Performance Standards (GPS) requirements, an active
 balancing generator gets turned off as part of the testing of
 the GPS and noted that there seems to be a hole in the rules
 in making balancing submissions for that, leading to those
 generators needing to put in a Forced Outage for a GPS
 test. There is no provision for a consequential outage, which
 affects the facility's outage count and costs.
 - Ms Guzeleva noted that GPS was introduced as part of the Energy Transformation Strategy work and there were still ongoing changes, including in Tranche 6 of the amending rules. Ms Guzeleva noted that she would discuss this with Mr Edwards to see whether it falls under the Energy Transformation Strategy work or if a formal rule change process is required.
 - Mr Edwards agreed to do so as part of the process.

Action: Mr Edwards to contact EPWA regarding treatment of GPS tests in the outage framework

Mr Edwards (October 2022)

8 Future Reviews

The paper was taken as read.

The Chair noted that feedback is being sought from the MAC on the draft Scopes of Work, and the priority and timing for:

- the review of the Procedure Change Process; and
- the review of the Participation of Demand Side Response in the WEM.

Ms Guzeleva noted that the review of the Procedure Change Process has been on the MAC work program since the governance changes and EPWA developing the work program. It was originally planned to be completed in 2022 but priorities were reassessed and it is now planned for 2023.

- Ms White noted that she was unaware that there are issues
 with the existing process and that she understood that
 parties like Western Power will have a similar process for
 their procedures in the new market, and questioned if this
 review was essential at this point in time.
- Mr Maticka noted that concerns were raised in the MAC (around three years ago) regarding transparency of AEMO's procedure change process. AEMO has changed some internal processes to make sure there is more communication when changes are made to procedures and is not aware of any issues since then. Mr Maticka noted that this should probably be reviewed on a regular basis to make sure that it is actually the most efficient process, but he would not deem it a high priority.
- Mrs Papps agreed with Ms White's comments about workload and noted that the outstanding concern is the gap when a participant proposes a procedure change to one of the procedure administrators, but there is no obligation for the procedure administrator to do anything with the request, whereas the Coordinator is required to decide whether to progress a Rule Change Proposal. Ms White agreed with this point.
- Ms Guzeleva noted that this issue was raised during the governance changes and is an important issue, and that most of the new procedures are being made through the expedited processes under the transitional rules. As more issues, that would ordinarily be in the WEM Rules, are placed in procedures for convenience and expediency, Ms Guzeleva had concerns that, with the 15-day consultation on procedure changes, proper attention is not paid to the changes. She was concerned that, as a result, there will be a flood of concerns in the future which will require a proper process to manage. Ms Guzeleva noted that this was an important issue that needed to be addressed but also noted that this was a matter of timing given the current work program.
- Mr Alexander asked if there are things in the procedures that directly affect small customers, particularly those with DER, and if there is a formal small consumer role in that process.
 - o Mr Maticka replied that this depends on the procedure, noting that procedures always have to be consistent with the WEM Rules, but there was a facility to escalate differing opinions to the MAC and that was part of the

reason why AEMO updates the MAC on procedure changes.

- Mr Alexander noted that, as a small use customer representative, it is hard enough to engage with the rule change process, let alone procedures. As the market changes and more important and directly consequential things are put in the procedures, it will be important to make sure that there is engagement and participation.
- Mr Maticka acknowledged Mr Alexander's point, noting that
 there is an enormous amount of material and small
 operators have other things to worry about than looking at
 procedures. Mr Maticka commented that, if someone did not
 have capacity to keep on top of what is happening in the
 market as a direct Market Participant, then they would
 probably have to go through some sort of representation.

The Chair noted that formalising the role of consumer engagement in the procedure change process could be included in the review and asked if this is a priority issue before market start in October 2023.

The Chair noted that it might fall back to EPWA to outline the resources that would be expected and for committee members to determine if they are able to participate in a review process at this time.

- Ms White asked if the expedited process for procedure changes would be retained, and if so, then this may not be a pressing issue.
- Ms White noted that, if we proceed with this review, the role for guidelines should also be considered, noting that GPS guidelines are tricky because they are not procedures and they hold less weight.
- Ms Guzeleva noted that a transitional rule allows for six months after market start to continue with the transitional procedure change process, so there was no deadline to do this by market start. Ms Guzeleva noted that the point about guidelines versus procedures is a good point and should be included in the scope, as should Mr Alexander's comment regarding customer representation.

Ms Guzeleva asked for MAC members to provide in writing any additional things they want to include in the scope, and said that EPWA will amend the scope accordingly.

Ms Guzeleva noted that sufficient time has not been spent on the participation of loads in any of the market components and that there are things that may prevent loads from properly participating. Ms Guzeleva asked if members feel this is a priority given that loads would have an important role to play in our market, which is clear in the RCM Review. Ms Guzeleva asked if

the review of Demand Side Response should commence in the new year.

- Mr Schubert and Mr Alexander agreed that it is very important that the review progresses as soon as resources allow.
- Mr Schubert noted that the market is short of capacity this coming summer and there are loads out there that could help.

Mr Schubert noted that certification and dispatch baseline for Demand Side Programs (DSP) and treatment of IRCR are listed as out of scope and asked about the process to address barriers that might be raised by the way we certify DSPs or treat IRCR.

- Ms Guzeleva noted that these things are out of scope because they are examined in the RCM Review.
- Ms Guzeleva noted that Mr Schubert first point is very important and will amend the scope to talk about scenarios for participation and analysis of those, noting that the MAC will probably establish a working group and will have to make sure that load participants are part of that group.
- The Chair noted that this was considered to be a high priority issue.
- Ms Teo noted that the RCM Review covers some of these issues
- Ms Varma noted that it would also be useful to consider the
 potential network services that DSPs can provide to ensure
 there is clarity between market services provided by DSPs
 and network services.

Action: MAC Members are to provide comment by 25 October on the Scopes of Work for:

MAC Members (25/10/2022)

- the review of the Procedure Change Process; and
- the review of the Participation of Demand Side Response in the WEM.

9 General Business

Mr Gaston sought further information about AEMO's call for Supplementary Reserve Capacity (**SRC**), noting that the total cost could be around \$180 million and that small use customers will incur these costs. He also noted that he was not sure about all the rule changes that went through when the refund regime for Forced Outages was last changed.

Mr Gaston indicated that he was happy to have an email circulated with more information or for AEMO to present its reasons for the SRC to the MAC.

Item	Subject	Action
	 Mr Sharafi noted that AEMO held a session specifically for the SRC process, that information is on the AEMO website, that he could email information to the MAC and that he could meet with Mr Gaston if further information is needed. 	
	 Ms Guzeleva noted that she could send the relevant rules to Mr Gaston or could meet with him, but there was not much else AEMO could do with the constraints the market is facing this summer. 	
	The next MAC meeting is scheduled for 15 November 2022.	
Action: AEMO to contact Mr Gaston to discuss what further information is required for the SRC process and is to provide the MAC with any agreed additional information.		AEMO (October 2022)
	Action: Mr Gaston is to contact EPWA regarding his questions about the rules on the refund regime for Forced Outages.	Mr Gaston (October 2022)

The meeting closed at 11:04am.