

Our ref: EDM 68830780
Contact: Tinna Needham (08 9267 3018)

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Energy Policy WA (energymarkets@dmirs.wa.gov.au)

Dear Dora,

2024 Supplementary Capacity Review

Western Power welcomes the opportunity to provide feedback on the *2024 Review of Supplementary Capacity Provisions Consultation Paper*.

Western Power welcomed the amendments made to the supplementary capacity provisions made during the 2023 review which resulted in improved clarity of Western Power's role in the process and has contributed to the overall positive perception by stakeholders of the 2024 supplementary reserve capacity process.

It is our view that the Supplementary Capacity Mechanism continues to be an 'emergency' market mechanism that can be triggered by AEMO in the event of a capacity shortfall. As such we continue to support the existing approach in the planning timeframe that targets sufficient capacity being available rather than relying on the Supplementary Capacity Mechanism being utilised each year in compressed/operational timeframes. This is due to the burden of supporting the supplementary capacity process when it is triggered and the likely higher costs to end consumers of capacity procured under the Supplementary Capacity Mechanism compared to the other mechanisms, such as the reserve capacity cycle.

Though most of the amendments proposed do not impact our role as the Network Operator or the Meter Data Agent we provide comment on the specific items below:

Proposal 1 – Pre-tender process

4.24.6AA AEMO must use reasonable endeavours to identify potential Eligible Services providers and contact them regarding any call for tender under clause 4.24.6.

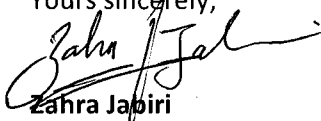
4.24.6AB Western Power must provide meter data to AEMO to assist it with identifying potential Eligible Service providers under clause 4.24.6AA.

We believe the intent of Proposal 1 is for AEMO to utilise meter data to identify potential suppliers of supplementary capacity. This proposal is implemented through the addition of clauses 4.24.6AA and 4.24.6AB. We request the following:

- that 4.24.6AB is amended to specify that the 'data' provided be 'meter data' to provide clarity for what data AEMO can request and what data Western Power is required to provide during the supplementary capacity process.
- Clarify in a WEM rule that AEMO must formally request the information, including the meter data required, the date range and a reasonable time period the data is required by.

If you have any questions, please do not hesitate to contact Tinna Needham.

Yours sincerely,



Zahra Jabiri

Head of Regulation and Investment Assurance

