

Minutes

Meeting Title:	Market Advisory Committee (MAC)
Date:	10 August 2021
Time:	9:35am – 11:15am
Location:	Level 1, 66 St Georges Terrace, Perth

Attendees	Class	Comment
Peter Kolf	Chair	
Martin Maticka	Australian Energy Market Operator (AEMO)	
Dean Sharafi	AEMO	Videoconference
Zahra Jabiri	Network Operator	Videoconference 10:10am-11:00am
Jo-Anne Chan	Synergy	Videoconference
Paul Keay	Small-Use Consumer	
Noel Schubert	Small-Use Consumer	Videoconference
Geoff Gaston	Market Customer	
Timothy Edwards	Market Customer	
Patrick Peake	Market Customer	
Daniel Kurz	Market Generator	
Wendy Ng	Market Generator	Videoconference
Jacinda Papps	Market Generator	
Tom Frood	Market Generator	Videoconference 9:45am-10:30am
Peter Huxtable	Contestable Customer	
Noel Ryan	Observer appointed by the Minister	
Sara O'Connor	Economic Regulation Authority (ERA) observer	

Also in Attendance	From	Comment
Kate Ryan	Coordinator of Energy (Coordinator)	Presenter to 10:45am
Dora Guzeleva	MAC Secretariat	

Also in Attendance	From	Comment	
Stephen Eliot	MAC Secretariat	Videoconference	
Jenny Laidlaw Laura Koziol	MAC Secretariat	Videoconference Videoconference	
	MAC Secretariat		
Rachelle Gill	Energy Policy WA (EPWA)	Videoconference	
Dimitri Lorenzo	Bluewaters Power – observer	Videoconference to 10:40am	
Oye Akindele Obe	Collgar Wind Farm – observer	Videoconference 10:20am-10:55am	
Rebecca White	Collgar Wind Farm – observer	Videoconference	
Rajat Sarawat	ERA – observer	Videoconference	
Oscar Carlberg	Alinta – observer	Videoconference	
Naomi Donohue	APA Group – observer	Videoconference	

Apologies	From	Comment
None		

Item Subject Action	on
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1 Welcome

The Chair opened the meeting at 9:35am and welcomed members and observers to the 10 August 2021 MAC meeting.

The Chair noted that:

- this was the first MAC meeting under the new Wholesale Electricity Market (WEM) governance arrangements that took effect on 1 July 2021;
- the MAC will play a broader market development role under the new governance arrangements;
- MAC members and proxies are expected to operate in the best interests of the market;
- the Chair will regularly meet with the Coordinator between MAC meetings to advise the Coordinator of any consensus views arrived at by the MAC, and of any dissenting views expressed by MAC members; and
- MAC members and observers can meet with the Chair or MAC Secretariat between MAC meetings to discuss new issues or existing issues if there is insufficient time at MAC meetings.

2 Meeting Apologies/Attendance

The Chair noted the attendance as listed above.

Item Subject Action

3 Minutes of Meeting 2021 06 08

Draft minutes of the MAC meeting held on 8 June 2021 were circulated on 28 June 2021. The MAC accepted the minutes as a true and accurate record of the meeting.

Action: MAC Secretariat to publish the minutes of the 8 June 2021 MAC meeting on the Coordinator's Website as final.

MAC Secretariat

4 Action Items

The closed action items were taken as read. Action item 5/2021 has not been completed.

5 Welcome from the Coordinator

Ms Kate Ryan welcomed the MAC members and indicated that the MAC will play an important role in making sure that she and the Minister, as decision-makers under the WEM Rules:

- have a complete picture of any proposals; and
- are aware of any emerging issues so that they can be addressed and prioritised in the evolution program.

Ms Ryan welcomed the independent Chair and the new independent small-use consumer representatives to the MAC. Ms Ryan indicated that the addition of the small-use consumer representatives was important to ensure that the MAC acts in the best interests of the market, in conformance with the Wholesale Market Objectives and for good outcomes for consumers.

Ms Ryan reinforced the Chair's comments that the MAC is to strive for consensus on issues where possible and that dissenting views should be captured when a consensus cannot be achieved, so that decision makers can weigh the competing interests in making decisions.

6 Update on WA Government Reforms and the Transformation Design and Operation Working Group (TDOWG)

Ms Ryan provided an update on the broader Western Australian Government reforms, and in particular the next stage of the Energy Transformation Strategy (ETS):

- EPWA launched ETS Stage 2 on 14 July 2021. ETS Stage 2 is about enabling the orderly transition to renewable and distributed energy in the South West Interconnected System (SWIS) to meet the tripartite objectives of affordability, reliability and lower emissions.
- Stage 1 of the ETS was led by the Energy Transformation Taskforce (Taskforce) and involved the WEM reforms, the first Whole of System Plan (WOSP) and the Distributed Energy Resources (DER) Roadmap.

- Other related initiatives included the Just Transition Plan for Collie, continuing to roll out Advanced Metering Infrastructure, and other pilots and trials.
- ETS Stage 2 is grouped into four key areas of work:
 - completing the implementation of Stage 1 Taskforce decisions, including:
 - commencing the second WOSP in late 2021 for release in late 2023;
 - implementing the new market arrangements, including security constrained economic dispatch; and
 - conducting further work around Non-Co-optimised Essential System Services (NCESS), market information and market power mitigation;
 - integrating new technologies, including the development of an action plan for electric vehicles;
 - o power system security and reliability, including:
 - planning for an orderly transition from coal-fired electricity generation;
 - maintaining our understanding of how the SWIS is changing over time and adapting to those changes, such as:
 - considering the low load issue currently affecting the SWIS; and
 - monitoring and evolving contingency planning and management arrangements, for example ensuring that Under Frequency Load Shedding (UFLS) and system restart still work in a high-DER environment; and
 - reviewing the Reserve Capacity Mechanism (RCM), including:
 - adequately valuing, assessing and rewarding the contribution of various technologies to reliability;
 - planning for the right contingencies in setting the Reserve Capacity Target; and
 - using the appropriate reference technology to set the Benchmark Reserve Capacity Price; and
 - regulating for the future, which is focused on:
 - the second stage of governance reforms, which will involve legislative change to move to a single energy code to:
 - provide clarity on the processes for code changes and on who are the decision-makers; and
 - establish a new alternative electricity services framework for registration of business models that

do not fit the traditional licenses or exemptions; and

- a review of Western Power's access framework (to commence after completion of Western Power's fifth Access Arrangement).
- The MAC will play an important role in the ETS Stage 2 initiatives. EPWA will consult with the MAC and establish Working Groups to help inform the issues and develop the solutions.
- Work to complete ETS Stage 1 will continue through the TDOWG but the MAC will otherwise be the primary consultation forum for the WEM.

Ms Dora Guzeleva provided the following updates:

- The Minister made the Wholesale Electricity Market
 Amendment (Miscellaneous Amendments No. 1) Rules 2021
 (Tranche 4A Amending Rules) in May 2021 which included:
 - additional transitional rules for the new Essential System Services (ESS) accreditation, the new RoCoF Control Service and how the cost of that service will be allocated;
 - several changes to fill in gaps in the RCM; and
 - provision for a protocol between AEMO and Western Power so they can coordinate on system security and reliability issues.
- EPWA was close to finalising the Tranche 4B Amending Rules, which will include:
 - amendments to the System Restart Service rules;
 - o new rules around UFLS; and
 - some additional changes to the RCM rules.

Tranche 4B is expected to go to the Minister for approval in August 2021.

- EPWA was working on the Tranche 5 Amending Rules that will cover:
 - NCESS rules;
 - registration and participation, including the new taxonomy and transitional rules; and
 - market information.
- Market power mitigation would not be part of Tranche 5 because of the mixed responses that EPWA received on the consultation paper, so this issue had been moved to 2022.
 - In response to a question from Mrs Jacinda Papps,
 Ms Guzeleva indicated that the plan was to complete design of the new market power mitigation strategy by October 2022, but implementation of the design was now

- expected to occur after commencement of the new market arrangements.
- Significant rule changes that impact on systems would be completed by the end of 2021 and EPWA had agreed a timeline with AEMO to prioritise these changes for the systems build.

7 Market Development Forward Reform Program

The Chair noted the meeting paper for this agenda item and the recommendation to the MAC to:

- review, discuss and agree the priorities for the Market Development Forward Work Program;
- discuss and agree whether existing Rule Change Proposals related to the RCM including RC_2019_03 (Method used for the assignment of Certified Reserve Capacity to Intermittent Generators), RC_2019_01 (The Relevant Demand calculation) and RC_2018_03 (Capacity Credit Allocation Methodology for Intermittent Generators) should be put on hold and considered as part of an overall RCM market evolution review (RCM Review);
- confirm whether it agrees with Secretariat's recommendations on the items that should be closed; and
- indicate whether any additional issues or reviews should be included in the list.

The following key points were discussed:

MAC Issues List

- Mrs Papps considered that the recent changes to the operation of Commissioning Tests had resolved issue 39 and recommended closing the issue. Mr Daniel Kurz, Ms Wendy Ng and Mr Dean Sharafi supported Mrs Papps' recommendation. Ms Ng noted that any problems identified in future with the new Commissioning Test regime could be addressed through the Procedure Change Process.
- Mr Geoff Gaston suggested that issue 22 (prudential arrangement design issue) should not be closed.
 - Mr Gaston noted that a Market Participant's anticipated maximum exposure (**AME**) calculation looks back 24 months and adds Balancing Market and STEM exposures together. Mr Gaston considered that these two exposures should not be combined in the AME and that the dynamic Outstanding Amount should truly represent the exposure to the market. It should be a relatively simple rule change to remove the AME calculation requirement and instead just require a Market Participant to maintain a positive Trading Margin relative to the dynamic Outstanding Amount.

Mr Martin Maticka noted that an alternative solution could be to reduce the period used to calculate the AME of a Market Participant.

RCM Review

- Mr Patrick Peake noted that he considered the RCM was not fit for purpose and the following three issues should be addressed in the RCM Review:
 - the complete change in the underlying market economics since the initial design of the RCM;
 - the question of when the SWIS is facing a mismatch between supply and demand that needs to be addressed by the RCM; and
 - that passing the risk of overinvestment in capacity on to generators will inhibit the entry of generators and other providers of dispatchable capacity.

Mr Maticka agreed that the RCM needs a full review but suggested that it should be considered how cumbersome the review should be and which issues should be included in the scope.

Mrs Papps noted her concern about how long the RCM Review could take. Mrs Papps considered it would be important to set the scope of work upfront. Ms Jo-Anne Chan agreed that the scope of work should be set first.

Mr Oscar Carlberg agreed with Mr Maticka and Mrs Papps that too broad a scope for the RCM Review risks creating uncertainty and disincentives for investment and that the market would benefit from the scope of the review being refined as soon as possible.

Ms Ryan noted that the intent was to set the scope of work at the beginning of the review.

- Mr Sharafi noted that there were upcoming issues with power system security, reliability and resiliency that needed to be addressed in the near future. Mr Sharafi considered that trying to address everything through the RCM Review could delay the implementation of important reforms, but there were other ways of achieving these reforms. For example, Mr Sharafi suggested that the current issue of firm capacity could be addressed through the RCM or through other rule changes that have a shorter timeframe.
- Mr Peake considered that it would take a long time for any results from the RCM Review to be implemented. However, currently there was no shortage of capacity and therefore it did not appear to be urgent. Mr Peake suggested that there will be a point where there is insufficient capacity in the SWIS and that delaying action until then would cause real issues because of

- the lead time required for investments. Therefore, Mr Peake considered that the review should be commenced quickly.
- Mrs Papps considered that the suggested high-level staging of the review was appropriate.
- Ms Guzeleva noted that the review was planned to take two years, roughly one year for the review and one year for rules and systems development.
- Mr Sharafi suggested making the timeline flexible because some issues that affected power system security and resilience would need to be addressed earlier.
- Mr Noel Ryan considered that the scope of work for the RCM Review could be presented at the next MAC meeting and the work could be completed in two years.
 - Ms Guzeleva confirmed that the intent was to discuss a draft scope of work at the next MAC meeting.
- Mr Peake asked whether MAC members should privately provide feedback on what should be addressed in the RCM Review and to whom this advice should be sent.
 - The Chair agreed that MAC members should provide him with their thoughts on the scope of the RCM Review.
- Mr Peter Huxtable asked whether the RCM Review would be resourced appropriately if it was made a priority.
- Ms Ryan confirmed that this was the intention and Ms Guzeleva noted that the intention was to also establish a MAC Working Group.

RC_2019_03

- Mrs Papps noted that Alinta has concerns about the current Relevant Level Methodology (RLM), as did the ERA.
 - Mrs Papps noted that Alinta was concerned that the current RLM would disincentivise future investment. However, Alinta considered that the proposal to use the delta method in the Draft Rule Change Report for RC_2019_03 was an abrupt shift away from what was agreed over the three-year ERA review process. Mrs Papps noted that Alinta had no recommendation on whether RC_2019_03 should be assessed as part of the RCM Review but suggested that the delta method needed a lot more consultation.
 - Mr Carlberg concurred with Mrs Papps and considered that further work on the RLM should not be delayed.
- Ms Rebecca White raised concerns that delaying the progression of RC_2019_03 would result in the current RLM being used to allocate initial Network Access Quantity (NAQs) to Intermittent Generators.
- The Chair asked whether Mrs Papps was agreeing to incorporate RC_2019_03 into the RCM Review. Mrs Papps

- expressed concern that including RC_2019_03 in the RCM Review would delay its progression and considered the options should be discussed further with the MAC.
- Mr Maticka suggested that it may be worthwhile to complete RC 2019 03 before the RCM Review.
- Ms Ryan gave a presentation about the relationship between RC_2019_03 and the RCM Review and made the following key points:
 - the current RLM has deficiencies;
 - the challenge of assessing RC_2019_03 outside of the RCM Review was that the ERA's RLM Review was undertaken in a particular context – the ERA did not try to design an RLM for the transition to a higher level of renewable penetration, which was what EPWA wanted to do under the RCM Review;
 - it was preferable not to change the RLM every three to five years; and
 - based on EPWA's estimated timeframes for processing RC_2019_03, a final decision was not achievable before the first quarter of 2022, so a new RLM could not be applied before the 2023 Reserve Capacity Cycle.
- Mr Timothy Edwards noted that the MAC had prioritised addressing the problems with the RLM over the previous year. Mr Edwards noted that he had supported the draft decision on RC_2019_03 and suggested that a final decision had been delayed because other Market Participants had requested more work. Mr Edwards suggested that, as a result, the current RLM would be used for the 2022 Reserve Capacity Cycle and RC_2019_03 may be relegated into a broader new policy.
- Mrs Papps suggested that the issue with RC_2019_03 was that
 the method proposed by the ERA had been completely
 overturned and replaced by the draft decision. Mrs Papps
 suggested that the method proposed in the draft decision was
 too volatile because it was based on three data points, and
 therefore presented a risk to Market Participants.
- The Chair agreed that the draft decision on RC_2019_03 presented a dramatic change to the ERA's proposal and needed further work. However, the Chair noted that the draft decision highlighted that the ERA's proposal had not considered the important aspects of saturation and interaction effects, and considered that the RLM needs to account for saturation and interaction effects to send the right investment signals.
- Mr Carlberg disagreed that the "interaction effect" can be measured by the delta method as the outputs of the delta method have been determined by three observations. Such few

- observations cannot accurately determine the interaction effect and won't send accurate signals to where to locate capacity as they will be far too volatile.
- The Chair responded that it was quite likely that the delta method was not perhaps entirely the basis upon which you would measure the interaction effect, and that there may be a need to consider a more complex method. The Chair noted that the delta method was not yet used in any jurisdiction, although it was proposed for use in the PJM system.
 - However, the Chair reiterated his view that the interaction and saturation effects identified in the RC_2019_03 draft decision were very important and needed to be appropriately accounted for within the RLM
- The Chair asked the MAC for advice on whether this further assessment of RC_2019_03, as well as RC_2019_01 and RC_2018_03, should be considered as part of the RCM Review or separately.
- Ms Ryan noted that if RC_2019_03 was processed before the RCM Review there was a risk that the outcomes of the RCM Review would lead to further changes to the RLM.
- Mr Maticka suggested that the decision on whether to include RC_2019_03 in the RCM Review should be based on the review's scope of work.
- Mr Peake raised concerns that the proposed RLM under the draft decision allowed for new entrants to affect the Relevant Level of incumbent Facilities. There was some discussion about whether the RLM should provide investment certainty to Market Participants.
- Mr Noel Schubert considered that the extent to which Intermittent Generators rely on Capacity Credits could be considered to determine the priority of RC 2019 03.
- Ms White suggested that investment certainty was critical for Intermittent Generators and delay of RC_2019_03 would delay investment certainty and therefore investment decisions for future projects.
- Ms White asked if the downside of delaying the progression of RC_2019_03, and hence allocating NAQ based on a flawed RLM, would exceed any benefits of the delay.
- Ms White and Ms Ng asked if a delay of RC_2019_03 would result in a delay of the commencement of the NAQ framework.
 Ms Ryan answered that the commencement of the NAQ framework would not be delayed.

RC_2018_03

 Mr Schubert asked whether RC_2018_03, which was proposed by Collgar, could be combined with RC_2019_03. Ms White noted that Collgar would have no issue with combining the two Rule Change Proposals.

Ms Guzeleva noted that if one of the Rule Change Proposals was resolved the other would be rejected.

General Rule Change Process

- Mr Edwards noted that the policy and technology in the SWIS are constantly changing. Mr Edwards suggested that processing a Rule Change Proposal should not take more than two years, but often took longer because proposals were put on hold due to upcoming policy changes or insufficient resources. Mr Edwards considered it unsatisfactory to delay RC_2019_03 further into the future by including it in the RCM Review.
 - Mr Edwards suggested that a Rule Change Proposal should be considered and either discarded or acted upon. Mr Edwards considered that if stakeholders expected the processing to take up to seven years, they would not bother to submit any proposals.
- Mr Kurz noted that long processing times for issues were not unique to the RLM.
- Mr Gaston noted that he hoped that as a result of the amended role of the MAC, issues identified by the MAC would result in the development of Rule Change Proposals. Ms Ryan agreed that this was the intent.

Other Market Evolution Reviews

Mrs Papps sought clarification on the meaning of replacement capacity in the paper for this agenda item. Ms Guzeleva clarified that this referred to facility technology changes and upgrades. Mrs Papps suggested that the assessment of replacement capacity would need to be undertaken earlier than the more general review of the NAQ framework.

Other matters

Mr Peake asked whether the Chair wanted to be advised if MAC members sent details of any matters to the MAC Secretariat.

The Chair noted that he would like to be copied into any emails sent to the MAC Secretariat.

Ms Guzeleva noted that the MAC Secretariat would provide the Chair's email address to MAC members and statutory observers.

Action: MAC Secretariat to provide the Chair's email address to MAC members and statutory observers.

MAC

Secretariat

MAC

Action: MAC members and statutory observers to provide the Chair and MAC Secretariat with feedback on what should be assessed in the RCM Review.

8 Update on Working Groups

8(a) Update on AEMO Procedure Change Working Group (APCWG)

Mr Maticka advised that APCWG meetings were held on:

- 19 July 2021 to discuss Procedure Change Proposal AEPC_2021_01: Reserve Capacity Testing; and
- 2 August 2021 to discuss Procedure Change Proposals AEPC_2021_02: Capacity Credit Allocation and AEPC_2021_03: Settlements.

The submission period for AEPC_2021_01 closed on 24 August 2021 and the submission periods for AEPC_2021_02 and AEPC_2021_03 closed on 6 September 2021.

9 Rule Changes

9(a) Overview of Rule Change Proposals

The MAC noted the overview of Rule Change Proposals.

Mr Sharafi commented that AEMO would provide input on any Rule Change Proposals before the next MAC meeting if details were provided.

Regarding RC_2014_05 (Reduced Frequency of the Review of Energy Price Limits and the Maximum Reserve Capacity Price), Ms Guzeleva commented that the Tranche 4B Amending Rules will transfer responsibility for the annual review of Energy Price Limits from AEMO to the ERA and that the forthcoming work on market power mitigation measures will further address the issues covered by the proposal.

Mr Peake indicated that Perth Energy will not develop a Rule Change Proposal to address the issues it had identified with Reserve Capacity Testing.

10 Changes to the MAC Constitution

The Chair noted the proposed changes to the MAC Constitution (**Constitution**) and indicated that most of the changes are to bring the Constitution in line with new market governance arrangements. The Chair also noted that the Coordinator would soon publish an invitation for submissions regarding the proposed amendments.

Mrs Papps noted that the most substantive change was in clause 4.8 of the draft Constitution, which places a six-year limit on the time that a person can be a MAC member after January 2021. Mrs Papps noted that there was only a small number of people with a regulatory background in the Western Australian electricity sector and questioned whether the intent was that a person can never again be on the MAC if they have served six years or if there must be a gap in their service.

Ms Guzeleva responded that the intent was that a person could never be reappointed after serving six years, but recognised the point about qualified persons, and indicated that consideration could be given to only requiring a gap in service. Ms Guzeleva indicated that a six-year period was selected because it aligns with the two-year term for membership and was consistent with the maximum term for the Chair.

Mrs Papps also pointed out that, depending on how clause 4.8 was interpreted, there was a risk that the entire MAC may need to retire at the same time.

The Chair agreed that there was a limited number of suitable candidates for the MAC in Western Australia, but considered that there was also a need to give new people an opportunity to serve on the MAC and have their say.

Mrs Papps suggested that the appointment methodology also needed to be considered because it was currently heavily weighted towards people with experience in groups like the MAC.

Mr Huxtable and Mrs Papps noted that clause 3.1 of the draft Constitution indicated that several classes of members are to have 'at least X and not more than Y' members, but that small-use consumers are to have 'at least two' members with no maximum limit. Ms Chan indicated that Synergy had also raised this concern previously.

Ms Guzeleva indicated that EPWA had received submissions during the consultation period for the recent governance changes suggesting that the MAC could be overwhelmed by consumer representatives but had concluded that there was virtually no risk of this happening. The Chair indicated that the Minister would likely take into consideration the balance of the MAC when nominating small-use consumer representatives.

Mrs Papps noted that Alinta had raised a question in its submission on the governance changes about whether Synergy should retain its compulsory MAC membership. Mrs Papps considered that compulsory Synergy membership was appropriate in the past because of Synergy's role as default balancer and as retailer to franchise customers, but that this may not be appropriate going forward, because Synergy will face the same rules as other Market Participants. Giving Synergy compulsory membership allows it to represent itself, whereas other members were required to represent the class that they were appointed to.

Ms Guzeleva indicated that EPWA had received this submission but that a conscious decision was made to leave Synergy with a compulsory position for now, and that this could be further considered when changes are made to streamline operation of the MAC and the WEM Procedure Change Process. The Chair agreed that it would be appropriate to consider the Synergy position at that time.

Item	Subject	Action
	Mr Sharafi indicated that AEMO agreed with the proposed changes to the Constitution.	
11	Approval of Changes to the Terms of Reference for the AEMO Procedure Change Working Group	
	The Chair noted the proposed changes to the Terms of Reference for the APCWG.	
	Mr Maticka indicated that AEMO has no concerns with the proposed changes.	

12 MAC Schedule for 2021

The Chair noted proposed dates for the next three MAC meetings:

- 21 September 2021;
- 2 November 2021; and
- 14 December 2021.

MAC members did not raise any concerns regarding these dates.

13 General Business

Mr Sharafi raised the issue of resourcing and indicated that:

- AEMO's resources were stretched and that the reform program was a huge body of work; and
- AEMO was identifying its resourcing requirements to deliver the reform program and would seek budget approval from the ERA.

Mr Kurz noted that the intent was to go back to virtual MAC meetings and expressed a view that there may be better outcomes from face-to-face discussions and having a wider audience join online.

The Chair agreed but suggested that virtual meetings may be needed while COVID protocols are in place and that face-to-face meetings could be reconsidered later.

Mr Rajat Sarawat noted that there were two types of observers – the statutory observers and those that request to join meetings. Mr Sarawat sought clarity on the role of unofficial observers – were they only there to listen or were they allowed to contribute to discussions and debate.

Ms Guzeleva indicated that there were two statutory observers – one appointed by the ERA and one by the Minister. The Chair indicated that the formal observers could contribute to discussions, but other observers are only to attend virtually. Mrs Papps indicated that section 6.2 of the Constitution covers the role of observers at MAC meetings.

The Chair noted that the next scheduled meeting of the MAC was set for 21 September 2021.

The meeting closed at 11:15am