

21 March 2023

**Our Ref: CWF-20230321**

Ms Dora Guzeleva  
 Director Wholesale Markets  
 Energy Policy WA

Via email: [energymarkets@dmirs.wa.gov.au](mailto:energymarkets@dmirs.wa.gov.au)

Dear Ms Guzeleva

**Review Supplementary Reserve Capacity Provisions – Stage 1**

Collgar Renewables welcomes the opportunity to respond to Energy Policy Western Australia’s (EPWA) Review of Supplementary Reserve Capacity Provision - stage one consultation paper. Collgar appreciates the review and questionnaire EPWA undertook and acknowledges the benefit to Market Participants that the review provides.

Collgar has the following comments in response to the proposed changes.

Proposal	Comments
1	<p><b>Non-binding EOI:</b></p> <p>To streamline the proposal process and encourage more submissions from interested parties, it is recommended that EOIs be made non-binding. This will allow potential participants to explore project ideas and demonstrate their interest without being committed to a particular course of action. A non-binding EOI can help minimise the risk of entering the proposal process and encourage more innovative solutions to be brought forward.</p> <p><b>AEMO Feedback on Proposal Likelihood:</b></p> <p>In order to avoid wasting valuable resources on preparing proposals that have a low chance of approval, it is proposed that AEMO provide preliminary feedback on the likelihood of a project being approved. This feedback can help guide project proponents in refining their proposals or identifying alternative solutions, ultimately leading to a more efficient and effective process for all involved.</p> <p><b>Additional Time or Information on SRAS Requirements:</b></p> <p>Lastly, it is recommended that more time be provided for the preparation of proposals, or that information on the likelihood of System Restart Ancillary Services (SRAS) being required be published in the Medium Term Projected Assessment of</p>

	System Adequacy (MTPASA) or the Electricity Statement of Opportunities (ESOO). This will allow project proponents to better understand the potential need for their services and align their proposals accordingly.
2	Collgar supports the proposed changes.
3	Collgar supports the proposed changes.
4	<p><b>Exemption for Minor Facility Changes in Western Power Modelling:</b></p> <p>To increase efficiency and reduce the burden on project proponents, it is recommended that a process be established to exempt certain projects from full Western Power modelling requirements when only minor changes are made to a facility. This exemption would apply to projects that do not significantly impact the overall facility performance or the interconnected power system. By implementing this exemption process, resources can be allocated more effectively, and project development timelines can be reduced.</p> <p><b>Relaxation of Application and Queuing Policy for SRAS Proposals:</b></p> <p>To expedite the proposal process for System Restart Ancillary Services (SRAS) projects, it is suggested that the Application and Queuing Policy be relaxed specifically for these types of proposals. This relaxation could include measures such as reduced waiting periods, streamlined application requirements, or prioritization of SRAS proposals in the queue. This policy adjustment would help accelerate the development and implementation of critical SRAS projects, ensuring a more resilient power system.</p>
5	Collgar supports the proposed changes.
6	Collgar understand the importance of ensuring that proposals submitted for assessment possess an adequate level of detail and quality. However, increasing the rigidity of the WEM Rules might not guarantee improved market outcomes. Instead, it may be more suitable for AEMO to undertake a thorough quality review when evaluating EOI proposals. Since network access might not be established before a proposal is submitted, the rules should offer flexibility in considering the project's likelihood of initiation. Collgar supports the possibility of relaxing compliance levels with technical rules, where feasible.
7	Collgar does not have any comments for proposal 7.
8	Collgar supports the proposed changes.
9	Collgar supports the proposed changes.

The consideration of these recommendations may lead to a more efficient and effective Supplementary Reserve Capacity review process by AMEO. By making EOIs non-binding, providing feedback on proposal likelihood from AEMO, and offering additional time or information

regarding the requirements, Market Participants can better allocate their resources and develop more targeted and useful proposals.

Yours sincerely



Jake Flynn

REGULATION AND TRADING SPECIALIST