

1 EXECUTIVE SUMMARY

Synergy would like to thank Energy Policy WA (EPWA) for the opportunity to provide feedback on the *Market Suspension: Exposure Draft – Proposed Wholesale Electricity Market (WEM) Amending Rules (Suspension Rules)*.

2 DETAILED COMMENTS ON PROPOSED DRAFTING

Market Suspension: Exposure Draft Proposed WEM Amending Rules				
#	Rule ref.	Classification	Issue	Suggestion
1	7.6.8	Clarity	<p>It is unclear as to why the requirement to record the information relating to a Dispatch Instruction as outlined information in clause 7.6.8 should not be required in a market suspension event.</p> <p>Synergy suggests the drafting for this clause is revised to the original draft, or alternatively a new clause is added that outlines the record keeping obligations that will be applied in a market suspension event.</p>	<p>7.6.8. For each Dispatch Instruction determined by the Dispatch Algorithm for a Scheduled Facility, Semi-Scheduled Facility or Interruptible Load, AEMO must record:</p>
2	7.7.1	Moderate	<p>Synergy notes that the original drafting was limited to variations in the reactive power output, however the proposed amendments are much broader. Synergy seeks clarity as to the requirement for the proposed amendments and notes that it may represent a change in AEMO's heads of power.</p> <p>Suggest the proposed amendments are reviews to the original drafting.</p>	<p>7.7.1 To support the Central Dispatch Process, AEMO may direct a Market Participant to vary the reactive power output of provide a service or operate a Registered Facility in a particular way in accordance with Chapter 3A. Chapters 3 or 7.</p>

Market Suspension: Exposure Draft Proposed WEM Amending Rules

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3	7.10.1B	Moderate	<p>This clause appears to require that, where AEMO issue a Dispatch Instruction retrospectively in relation to a direction, that the retrospective Dispatch Instruction will not supersede Dispatch Instructions for later intervals that were issued earlier than the direction was made. Since directions can go beyond the scope of a Dispatch Instruction, this raises the possibility that the later Dispatch Instruction may not be achievable given the direction.</p> <p>Synergy suggests that the drafting of this clause be amended either:</p> <p>(a) to place an obligation on AEMO to ensure consistency between directions and any subsequent Dispatch Instructions; or</p> <p>(b) to relieve Market Participants of the obligation to comply with a Dispatch Instruction where a prior direction makes it impossible to do so.</p>	