



16 August 2023

Energy Policy Western Australia
Level 1, 66 St Georges Terrace,
Perth, WA 6000

Sent via email to: energymarkets@dmirs.wa.gov.au

TRANCHE 7 AMENDING RULES – EXPOSURE DRAFT

Alinta Energy appreciates the opportunity to provide feedback on the exposure draft of the tranche 7 amending rules to implement the new WEM from 1 October 2023.

Alinta Energy raises a small number of issues and recommended solutions for EPWA's consideration in the table over the page.

Thank you for your consideration of Alinta Energy's submission. If you would like to discuss this further, please contact Oscar Carlberg at oscar.carlberg@alintaenergy.com.au or on 0409 501 570.

Yours sincerely

Jacinda Papps
General Manager, Regulatory Affairs & Compliance

Topic	Rule reference	Alinta Energy comment
AEMO Intervention Event	Definition	<p>While not a proposed change in the amending rules, Alinta Energy considers that the definition of AEMO Intervention Event should be updated.</p> <p>The current definition of AEMO Intervention Event is:</p> <p style="padding-left: 40px;">An event where AEMO intervenes in the Real-Time Market by issuing a direction in accordance with clause 3.4.4(c), clause 3.4.4(d), clause 3.4.5, clause 7.7.4(b), or clause 7.7.5.</p> <p>Alinta Energy considers that directions made under clause 3.5.5 should also be included in the definition of AEMO intervention event.</p> <p>This would ensure that AEMO is required to include directions made under an Emergency Operating State are included in a Market Advisory (pursuant to clause 7.11.5(i) in a similar manner to directions made while in a secure or satisfactory operating state).</p>
Recording directions	3.5.5A	<p>Alinta Energy supports the requirement for AEMO to record details of directions issued or other actions taken under clause 3.5.5 (similar to its obligations under existing clause 3.4.5A).</p> <p>However, we request clarification on the interaction of this clause 3.5.5A and the requirements for AEMO to record directions under clause 7.7.10 as it appears that the information recorded will be similar (given the preceding clauses 7.7.8 and 7.7.9 refer to directions made under clauses 3.4.4, 3.4.5 or 3.5.5).</p>
Revoking directions	N/a	<p>While not a proposed change in the amending rules, Alinta Energy suggests that EPWA consider adding the following additional clauses regarding directions under an emergency operating state in section 3.5 of the WEM rules:</p> <ul style="list-style-type: none"> • AEMO must use its reasonable endeavours to minimise any cost related to directions pursuant to clause 3.5.5. • A direction made under clause 3.5.5 should be revoked as soon as AEMO determines that the direction is no longer required.