

## 1 EXECUTIVE SUMMARY

Synergy would like to thank Energy Policy WA (EPWA) for the opportunity to provide feedback on the *Tranche 7: Exposure Draft – Proposed Wholesale Electricity Market (WEM) Amending Rules (Tranche 7 Rules)*.

## 2 DETAILED COMMENTS ON PROPOSED DRAFTING

| Tranche 7 Draft Amending WEM Rules |                       |                |  |  |
|------------------------------------|-----------------------|----------------|--|--|
| #                                  | Rule ref.             | Classification | Issue  | Suggestion   |
| 1                                  | 3.18D.2 (and 3.18D.1) | Moderate       | <p>Synergy considers that proposed drafting for this clause removes the ability for Market Participants to make minor adjustments to approved outages as is currently permissible (and allowable under clause 3.18D.1). Synergy is of the view that the intent of the original drafting of clause 3.18D.2 is for clarity purposes only to ensure that amendments are not being made to rejected or withdrawn outage requests.</p> <p>Synergy suggests that the drafting is revised as proposed, noting that clause 3.18.D.1 also requires drafting amendments as proposed.</p> | <p><b>3.18D.2</b><br/>           Subject to clause 3.18D.1, a Market Participant or a Network Operator may revise an <del>An</del> Outage Plan that has not been <del>approved or</del> rejected by AEMO or withdrawn by the Rule Participant <del>may be revised at</del> any time as long as the revised Outage Plan would meet the requirements specified in clause 3.18B.8 if it was submitted as a new Outage Plan at the time of revision.</p> <p><b>3.18D.1</b><br/>           A Market Participant or a Network Operator may <b>only</b> revise an <b>approved</b> Planned Outage at any time prior to the completion of the Planned Outage, provided:</p> <ul style="list-style-type: none"> <li>(a) the revised Outage Commencement Interval is not earlier than the previous Outage Commencement Interval;</li> <li>(b) the revised Outage Completion Interval is not later than the previous Outage Completion Interval;</li> <li>(c) any revised Remaining Available Capacity for the Outage Facility, as relevant, is not proposed to be further reduced from the previous submission; and</li> <li>(d) other aspects of the Planned Outage, as specified in the WEM Procedure referred to in clause 3.18.4, are unchanged.</li> </ul> |
| 2                                  | 3.18D.3               | Moderate       | <p>Suggest that the clause should only be applied to approved outages where the amendments are “reducing” the MW or duration of the outage in line with clause 3.18D.1</p>   | <p><b>3.18D.3</b><br/>           AEMO may, but is not required to, undertake an Outage Evaluation for an Outage Plan revised under <b>clause 3.18D.1</b> <del>clauses 3.18D.1 or 3.18D.2</del> where the reason for the revision is one or more of the following:<br/>           ....</p>  |

Tranche 7 Draft Amending WEM Rules

| # | Rule ref.                 | Classification     | Issue   | Suggestion  |
|---|---------------------------|--------------------|---|---|
| 3 | 4.15.9 and 4.15.9A        | Moderate / Clarity | <p>Synergy seeks clarity as to the reasoning behind the proposed amendment to clause 4.15.9 and the requirement for the new clause 4.15.9A. Under what circumstances and situations is it expected that the requirements of clause 4.15.9 and Appendix 3 cannot both concurrently be met?</p> <p>Is there a current requirement for this clause to be introduced due to implementation requirements? Further, would it be possible for AEMO or EPWA to provide clarity as to the expected differences in outcomes if clause 4.15.9 were to prevail over Appendix 3 instead?</p> |   |
| 4 | Explanatory Note (6.3A.3) | Typographical      | Minor typographical edits suggested for the Explanatory Note above clause 6.3A.3.   | <p>...</p> <p>To address these concerns, the clauses are amended to require the determination of estimates for all Scheduled Facilities and Semi-Scheduled Facilities that are registered to a Market Participant in the relevant Trading Interval <b>and/or</b> Dispatch Interval.</p> |