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Energy Policy WA
 Email: energymarkets@dmirs.wa.gov.au

Dear EPWA,

WEM GUIDELINE: NON-CO-OPTIMISED ESSENTIAL SYSTEM SERVICES

Synergy welcomes the opportunity to provide feedback in relation to the proposed WEM Guideline: Non-Co-optimised Essential System Services (**NCESS Guideline**).

Energy Policy WA (**EPWA**) is seeking feedback to the newly developed NCESS Guideline that is written in accordance with clause 3.11A.2A of the Wholesale Electricity Market Rules (**WEM Rules**). Synergy is generally supportive of the proposed NCESS Guideline and provides the following feedback:

Section Number	Item for Considerations
3.1.2 & 3.1.3	<p>The NCESS Guideline has stipulated that Non-Co-optimised Essential System Services (NCESS) can be procured for various market requirements in parallel. However, neither the NCESS Guideline nor the WEM Rules stipulate how the requirements will be prioritised when the differing market needs overlap (e.g. Voltage vs Frequency; or minimum demand vs peak). Synergy notes that a similar situation arose with the NCESS for minimum demand¹ and the 2023-24 Supplementary Reserve Capacity² (SRC) tenders, where the availability obligations for one service may disqualify a facility such as a battery to be able to meet the obligations of the other service.</p> <p>Clause 3.1.4 attempts to do this, however where multiple tenders are competing for facilities to undertake a service, it would be desirable if the service prioritisation order can be clearly communicated, and also if additional considerations may be needed to allow for facilities to participate in multiple services provided that it would not impact on the service delivery.</p>
3.2.1(a)	<p>Synergy suggests that the NCESS Guideline specifies a required notification period for notifying other parties in accordance with paragraph 3.2.1(a).</p>
3.2.6	<p>Suggest that the reference to section 3.3 in paragraph 3.2.6 is in error and should instead refer to Section 4.</p>

¹ Refer to AEMO's [NCESS Service Specification \(Minimum Demand\)](#) published 16 May 2023

² Refer to AEMO's Invitation to Tender [Supplementary Capacity](#) published 11 August 2023

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4.1.5	Synergy notes that in determining a due date under paragraph 4.1.5, the Coordinator may also need to consider a reasonable time allowance for Market Participants to respond to any clarifications being sought by Western Power or AEMO in undertaking their assessment.

Please contact me should you have any queries in relation to this submission.

Yours sincerely



RHIANNON BEDOLA
SENIOR ELECTRICITY MARKETS ADVISOR