

Our ref: EDM 68109920
Contact: Tinna Needham (08) 9267 3018

24 April 2024

Ms Dora Guzeleva
Energy Policy WA
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Perth WA 6000

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Dear Dora

Demand Side Response Review – Exposure Draft of WEM Amending Rules

Western Power supports the purpose of this review to ensure adequate incentives for DSR participation in the WEM and welcomes the opportunity to comment on an Exposure Draft of WEM Amending Rules that give effect to the Demand Side Response (DSR) Review outcomes.

As notified to Energy Policy WA, email notifications for the commencement of this consultation were not received by Western Power in a timely manner to complete internal consultation on the Exposure Draft ahead of developing this response. As a result, this response is limited to high level key notes and Western Power will follow-up with further detailed feedback for consideration by Energy Policy WA outside of the formal consultation period.

Western Power provides the following feedback:

- The Exposure Draft sets out the requirements for Western Power to share information on constrained access loads with the Australian Energy Market Operator (AEMO). It should be clarified whether these requirements apply to constrained access connections being connected on the transmission, distribution medium voltage and distribution low voltage networks.
- There is a potential that the proposed drafting would reach additional customer connections that are non-market customers and whose operation do not impact system security. As such, consideration should be given to the relevance of this information to the market as well as Western Power's confidentiality obligations.
- Practical application of clause 7.3.5 should be addressed, in consultation with AEMO.
- Western Power also acknowledges that the time required to implement some of the changes referred to in the Exposure Draft may require lead time so requests that EPWA share the expected effective date for the amendments as soon and known and with consideration of any potential lead time requirements.



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Western Power will provide Energy Policy WA with further written feedback by 3 May 2024, and welcomes the opportunity to further discuss the feedback. In the meantime, if you have any questions, please do not hesitate to contact Tinna Needham on (08) 9267 3018.

Yours sincerely,

Zahra Jabiri

Head Of Regulation & Investment Assurance