

# WEM Procedure Submission Template

WEM Certification of Reserve  
Capacity



# Stakeholder Submission

Name of stakeholder: AGL

Date of submission: 9 November 2022

Contact: Mark Riley [mriley@agl.com.au](mailto:mriley@agl.com.au) 0475 805 262

Relevant Procedure Paragraph(s)	Submission
1.1.1 Purpose	Throughout the procedure the document refers to the WEM Rules (eg 1.1.5). Should the addition be amended to Wholesale Electricity Market ( <a href="#">WEM</a> ) Rules ( <del>WEM</del> )
1.4	Some procedures seem to be named Market Procedure and Others WEM Procedure. Is this a timing issue that some procedures have not been re-named ?
3.3.3	Noted
5.2.3	Noted
5.2.4	Noted
5.3.3 (a)(iii)	AGL notes the information requirement for fuel delivery, but as consumption has not been requested (eg a dual fuel station) this information may be an unnecessary burden and make no sense. For a gas generator connected to a gas transmission system, the fuel deliveries and timings will vary depending on generation and any on-site storage. Similarly, any secondary fuel storage and deliveries would be quite variable, with usage potentially on dependent on consumption prior to aging. As such, it would be normal for a secondary fuel to have quite varied delivery dates and quantities. Neither piece of data indicates that the fuel source is at risk or the generator is at risk of not being able to generate during the required periods. Finally, this question is more related to fuel supply rather than fuel contract.
5.3.3(b)(i)	AGL notes that these questions on fuel supply have not differentiated between primary and secondary fuel.
5.3.3(b)(ii)	AGL would consider this question one related to fuel contract, rather than supply.
5.3.3(b)(iii)	AGL would consider this to be the most relevant question, as historical actions may have no bearing on current plant operation.
5.3.4	Noted

Relevant Procedure Paragraph(s)	Submission
5.3.5	<p>While these aspects are a factor in AEMOs assessment, AEMO should confirm with the Market Participant if their assessment of fuel capability is correct moving forward.</p> <p>Historical problems with fuel sourcing may have led to a recent replacement contract which invalidates the impact of the historical data.</p> <p>AGL suggest that if AEMO considers that there may be operating restrictions, then AEMO should be require to discuss and establish with the relevant market participant if those restrictions still hold, and if so, to what extent.</p>
5.3.10	Noted -although this clause would seem more reasonably follow CI 5.3.1 not clause 5.3.9
5.5.1	Noted
7.2.6	Noted
9.2.2	Noted
Appendix A	noted