

# WHOLESALE ELECTRICITY MARKET

## Submission to Procedure Change Proposal

### AEPC\_2020\_04 Reserve Capacity Testing

<b>Submitted by</b>	
<b>Name:</b>	Oscar Carlberg
<b>Phone:</b>	0409 501 570
<b>Fax:</b>	
<b>Email:</b>	<a href="mailto:Oscar.carlberg@alintaenergy.com.au">Oscar.carlberg@alintaenergy.com.au</a>
<b>Organisation:</b>	Alinta Energy
<b>Address:</b>	Level 18 Raine Square 300 Murray Street, Perth WA 6000
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### Submission

Clause 2.10.7 of the Wholesale Electricity Market Rules provides that any person may make a submission for a Procedure Change Proposal (including proposals developed by AEMO, the Economic Regulation Authority or the Rule Change Panel) by completing this Procedure Change Submission form.

Submissions should be provided by email to the nominated contact in the call for submissions published with the Procedure Change Proposal.

**Please provide your views on the Procedure Change Proposal, including any objections or suggested revisions**

Alinta Energy appreciates the opportunity to provide feedback on the proposed changes to the Reserve Capacity Testing Market Procedure.

Alinta Energy broadly supports the Procedure Change Proposal and its intent to clarify the Reserve Capacity Testing process.

Alinta Energy raises the following issues and suggested solutions for the AEMO's further consideration.

**Step 4.1.1 and Step 4.1.2**

Alinta Energy is concerned that steps 4.1.1 and step 4.1.2 read as though a Facility must pass Reserve Capacity Test even where it has passed an Observation Test. While Alinta Energy understands that this is not the intent of the proposed changes, it suggests the following amendments to clarify that a Reserve Capacity Test is not required after a Facility passes an Observation Test:

4.1.1 The verifications referred to in step 2.11 of this Procedure may be achieved by a Facility successfully passing an Observation Test at any point within a testing period ~~until AEMO conducts a Reserve Capacity Test for the Facility under section 5 of this Procedure.~~

4.1.2 AEMO must use Meter Data Submissions available to it to determine the Observation Test results ~~until the time a Reserve Capacity Test is conducted.~~

**Step 5.1.1**

Alinta Energy suggests that 5.1.1(a) and (b) be re-arranged as AEMO would have regard to whether a facility has completed an Observation Test before determining whether a Reserve Capacity Test is required.