

WHOLESALE ELECTRICITY MARKET

Submission to Procedure Change Proposal

AEPC_2024_03

WEM Procedure: Long Term Projected Assessment of System Adequacy

Submitted by	
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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, the Coordinator of Energy or a Network Operator) 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

Proposed paragraph 3

Synergy notes the following in relation to proposed paragraph 3:

- The amendment to paragraph 3.1.8 changes the requirement on AEMO, to publish the summary of the methodology it uses to prepare forecasts under paragraphs 3.1.2 or 3.1.3 in the Statement of Opportunities Report, as discretionary rather than mandatory. Synergy is of the view that publication of the summary of the methodology that AEMO utilises should still be required under the Procedure for the purposes of transparency and accountability.
- Synergy seeks clarity from AEMO as to the level of certainty that would be required before hydrogen production is included in the reference case in preparing the LT PASA Study Horizon in accordance with proposed paragraph 3.1.4(i).

Typographical errors and other minor revisions

Synergy notes the following typographical errors and revisions in the Procedure Change Proposal:

- 'Utility-scale' should be amended to 'utility-scale' in the definitions of the terms 'ESOO Unscheduled Operational Consumption' and 'ESOO Unscheduled Operational Demand' at Table 1 of the Procedure.
- The word 'or' should be inserted between the words "Statement of Opportunities Report" and "on the WEM Website" at paragraph 6.1.2.
- The word "Report" should be inserted after the words "Statement of Opportunities" at paragraphs 7.1.2 and 7.1.5 of the Procedure.
- References to the "Statement of Opportunities Report" be replaced with references to the "Electricity Statement of Opportunities Report" as it is referred to in Table 2 at paragraph 1.4.1 of the Procedure.
- Reference to "Registered Participant" be replaced with a reference to "Rule Participant" at paragraph 2.1.6 as it is referred to throughout the rest of the Procedure.

Please provide an assessment whether the Procedure Change Proposal is consistent with the Market Objectives and the Wholesale Electricity Market Rules.

Synergy views that the Procedure Change Proposal is overall consistent with the Market Objectives and WEM Rules.

Please indicate if the Procedure Change Proposal will have any implications for your organisation (for example changes to your IT or business systems) and any costs involved in implementing these changes.

Synergy foresees no implications for our organisation, or any associated costs involved, in implementing the changes as proposed.

Please indicate the time required for your organisation to implement the changes, should they be accepted as proposed.

Synergy foresees no issues with implementing any changes should they be accepted as proposed.