

WHOLESALE ELECTRICITY MARKET

Submission to Procedure Change Proposal

AEPC_2020_02

Certification of Reserve Capacity

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 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

Bright Energy Investments (BEI) is pleased to provide the below feedback to Australian Energy Market Operator (the 'AEMO') regarding the proposed amendments to the Market Procedure: Certification of Reserve Capacity.

BEI is the owner of Albany Grasmere wind farm, Greenough River solar farm and currently in the process of constructing Greenough River solar farm expansion and Warradarge wind farm which will bring the total to 256MW of renewables operating in the SWIS when complete later in 2020.

BEI has reviewed the proposed rule changes to the Reserve Capacity Certification procedure and makes the following comments:

Step 3.1.11

The proposed update in 3.1.11 asks for an Intermittent Generator's data relating to temperature dependence which AEMO describes as "capacity, where available, including any restrictions on Facility output at certain ambient temperature". This data can be submitted if available however it is unclear how and when AEMO intend to utilise this information in the certification process of Intermittent Generators through the Relevant Level Methodology (RLM).

At present the RLM process incorporates temperature dependency, using actual or modelled data, as part of the capacity certification assessment process. Therefore, BEI believes there is no requirement to separately take the requested information into account and doing so may result in Market Participants capacity credits being incorrectly calculated.

Furthermore, due to the inconsistency of the data that "may" be submitted it is possible that the results could differ between those who submit the data and those who do not. It is unclear how AEMO would choose when to apply this information, hence some Market Participants could be exposed to reduced capacity credits.

Taking all of this into consideration BEI requests clarity on AEMO's intended use of the information requested.

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

As stated above, BEI believes that the current Reserve Capacity Certification procedure already takes ambient temperature into consideration when assessing Intermittent Generators through the RLM.

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.

It is unlikely the proposed changes will cause any implementation costs to BEI.

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

It is not expected that BEI will need to any time to implement changes.