

WHOLESALE ELECTRICITY MARKET

Submission to Procedure Change Proposal

Facility Registration, De-registration and Transfer AEPC_2020_03

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

Synergy welcomes the opportunity to provide feedback on the call for submissions: AEPC_2020_03 – Facility Registration, De-registration and Transfer (**Procedure**).

Synergy considers the proposed amendments to the Procedure are largely administrative in nature and facilitate the enhancement of administrative clarity. Synergy is therefore supportive of the proposed changes, however, raises the following administrative considerations for the Australian Energy Market Operator’s (**AEMO**’s) review.

General: Synergy notes that the Wholesale Electricity Market (**WEM**) Rules have been revised several times since April 2020 when the changes to the Procedure were first presented to the AEMO Procedure Change Working Group (**APCWG**). Synergy suggests the WEM Procedure should be amended to reflect the formatting of new WEM Procedures released as part of the New Energy Transformation Strategy, which involves:

- a) usage of ‘paragraph’ and ‘part’ instead of ‘sections’ (e.g. paragraph 1.2.3);
- b) correction of redundant terminology, e.g. ‘WEM Procedure’ as opposed to ‘Market Procedure’ (e.g. paragraph 1.1.1); and
- c) the replacement of portions of part 1.1 and part 1.2 of the WEM Procedure to reflect the new formats (take for example, the Credible Contingency Events WEM Procedure¹)
 - a. e.g. paragraph 1.1.3 references clause 2.9.7 which is now ‘[blank]’ under the February 2021² WEM Rules.

Synergy also suggests a broad overview of the entire Procedure (including paragraphs outside of the proposed tracked changes) against the current WEM Rules to ensure consistency.

Version release history: Note that the effective date should be 2021, not 2020 and that ‘Market Procedure’ should be replaced with ‘WEM Procedure’. Corresponding corrections to the Footer are also recommended.

6.0	XX Month 2020	Amendments to Market Procedure resulting from Procedure Change Proposal AEPC_2020_03
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XX Month 2020 TBA

Paragraph 1.1.2: the purpose does not appear to reflect clause 2.31.23 of the WEM Rules. Synergy suggests the following amendment:

- 1.1.2: The purpose of the Procedures is to outline the processes by which ~~AEMO~~ applicants can Register, De-Register and Transfer Facilities under the WEM Rules.

Table 1: Synergy suggests the following amendments to Table 1, which outlines the defined terms used throughout the WEM Procedure:

¹ <https://www.wa.gov.au/government/publications/draft-wem-procedure-credible-contingency-events>
² <https://www.erawa.com.au/cproot/21723/2/Wholesale-Electricity-Market-Rules-1-February-2021.pdf>

- a) Aggregation – When describing the aggregation of one or more Facilities under section clause 2.30 of the WEMMarket Rules;
- b) Applicant - An entity or Rule Participant applying for Registration, De-registration or Transfer of a Facility;
 - a. note that Participant is not defined in the WEM Rules
- c) Associate or Associating - Refers to the Associated Load with a Demand Side Programme pursuant to clause 2.29.5B of the WEMMarket Rules;
- d) De-registration - The termination of Registered status for any of the Facilities described in clause 2.29.1 of the WEMMarket Rules;
- e) Disaggregation - When describing the disaggregation of one or more Facilities;
- f) Non-aggregated Facility - A Facility that is not aggregated in accordance with section Clause 2.30 of the WEMMarket Rules; and
- g) Register or Registration - The process of registering a Facility pursuant to section clause 2.31 of the WEMMarket Rules.

Paragraph 3.1.4: Synergy suggests the following corrections

- 3.1.4. Applicants must indicate in the Request for Facility Creation form which type of Facility they wish to create. This can either be:
 - a) a Normal Non-aAggregated Facility: in the case of Non-aggregated single Facilities; or
 - b) an Aggregated Facility: in the case where an aggregated parent Facility is created for use in the Facility Aggregation process (refer to Procedure paragraph step 6.1).

Paragraphs 3.2.15, 4.1.10: Referencing errors

- 3.2.15. Where AEMO approves determines an Application in accordance with step 3.2.14, ...
- 4.1.10 Where AEMO accepts an Application in accordance with step 4.1.9, ...

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

Synergy considers the proposed changes to the WEM Procedure are largely consistent with the Wholesale Market Objectives because it clarifies Market Participants' obligations under the 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.

The proposed changes have no foreseeable impacts on Synergy IT and business systems.

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

Synergy is able to implement the proposed changes immediately.