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Matthew Martin
Public Utilities Office
Submission by email: PUOSubmissions@treasury.wa.gov.au

3 April 2018

Dear Mr Martin

**RESPONSE TO CONSULTATION PAPER - MODELLING THE IMPACTS OF CONSTRAINED ACCESS:
METHODOLOGY AND ASSUMPTIONS CONSULTATION PAPER**

Bluewaters welcomes the opportunity to provide comments on the paper entitled “Modelling the Impacts of Constrained Access: Methodology and Assumptions Consultation Paper” (Third Consultation Paper). This paper was published by the Public Utilities Office (PUO) on 1 March 2018.

Bluewaters notes that this Third Consultation Paper is one of the three¹ papers published by the PUO for stakeholders’ consultations in regards to issues relating to the proposed constrained network arrangement in the Wholesale Electricity Market (WEM).

Bluewaters notes that the assumptions to be used for the modelling are set out in the spreadsheet entitled “Modelling the impacts of constrained access: Data workbook”.

The spreadsheet has not set out any assumptions in regards to utility scale battery farms. Bluewaters considers the emergence of utility scale battery in the WEM is foreseeable within the study period and should be included in the base assumptions. The remaining assumptions appear acceptable for the modelling process.

As such, Bluewaters proposes this assumption be taken into consideration in the modelling study.

Should you have any questions regarding this submission please contact Daniel Kurz on 08 9261 2881 or daniel.kurz@bluewatersps.com.au.

Yours sincerely

Daniel Kurz
General Manager – Trading, Commercial & Regulatory

¹ As of 26 March 2018.