

Wholesale Electricity Market Rule Change Proposal Submission

RC_2017_03

Change in the Publication Date for Relevant Level Information

Submitted by

Name:	Rhiannon Bedola
Phone:	(08) 6282 7571
Email:	rhiannon.bedola@synergy.net.au
Organisation:	Synergy
Address:	GPO Box F366, Perth, WA 6841
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Submissions on Rule Change Proposals can be sent by:

Email to: rcp.secretariat@rcpwa.com.au

Post to: Rule Change Panel
Attn: Executive Officer
C/o Economic Regulation Authority
PO Box 8469
PERTH BC WA 6849

- Please provide your views on the proposal, including any objections or suggested revisions.**

Synergy thanks the Rule Change Panel for the opportunity to provide comment on the *Wholesale Electricity Market Rule Change Proposal: Change the Publication Date for Relevant Level Information (RC_2017_03)* (**Rule Change Proposal**) as raised by the Australian Energy Market Operator (**AEMO**).

As noted by the Rule Change Panel within the *Rule Change Notice: Change in Publication Date for Relevant Level Information RC_2017_03*, in the Final Rule Change Report on RC_2010_25 and RC_2010_37, the Independent Market Operator (**IMO**) stated that the 1 June publication date would “allow existing facilities to consider this information prior to the closure of the window for certification applications on 1 July”¹. Synergy is of the view that this statement is still valid, and therefore provisional values should be published prior to the closure of the window for certification applications.

¹ Final Rule Change Report: Calculation of the Capacity Value of Intermittent Generation – Methodology 1 (IMO) and Methodology 2 (Griffin Energy) RC_2010_25 and RC_2010_37, page 24 of 151

Synergy notes that within the Rule Change Proposal AEMO has stated that it “will publish provisional EFLSG intervals by 1 June to assist Market Participants to estimate the Certified Reserve Capacity level that will be assigned to their Facilities, with the disclaimer that the intervals are subject to change”². However, the AEMO’s proposed drafting does not include an obligation on the AEMO to provide provisional data. Synergy is of the view that the rule change should include an obligation on the AEMO to provide provisional data and proposes the following drafting to include an obligation for provisional data to be provided.

Step 19: Publish on the Market Web Site by 1 June of Year 1 of the relevant Reserve Capacity Cycle:

- a) a forecast of the Trading Intervals that will be identified in step 8; and
- b) a forecast of the Existing Facility Load for Scheduled Generation quantities that will be determined in step 7.

Step 20: Publish on the Market Web Site within three Business Days after the date specified in clause 4.1.11 for the relevant Reserve Capacity Cycle:

- a) the Trading Intervals identified in step 8; and
- b) the Existing Facility Load for Scheduled Generation quantities determined in step 7.

2. Please provide an assessment whether the change will better facilitate the achievement of the Wholesale Market Objectives.

Synergy is of the view that this information is an important consideration for Facilities in their decision making for applying for certification. Hence, as in item 1 above, Synergy proposes that draft values are published prior to the closure of the window for certification applications.

Synergy agrees with the AEMO in that market objective (a) and (c) are better achieved by setting the values of step 19 in Appendix 9 after the closure of the window for certification applications, on the proviso that draft values are made available prior to the closure of the window for certification applications. If, however, draft values are not going to be provided, Synergy is of the view that changing the publication date to after the closure of the window for certification applications may result in sub-optimal outcomes for market objectives (a) and (c), in that renewable generation may be disadvantaged in making investment decisions without having this information available prior to applying for certification.

3. Please indicate if the proposed change 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 is currently unsure of what (if any) the implications will be on Synergy’s certification decision making if draft values for step 19 of appendix 9 are not available at the time of certification.

Synergy does not anticipate any costs associated with implementing the Rule Change Proposal.

² Wholesale Electricity Market Rule Change Proposal: Change the Publication Date for Relevant Level Information (RC_2017_03), page 3 of 4.

- 4. Please indicate the time required for your organisation to implement the change, should it be accepted as proposed.**

Synergy does not require any time to implement the Rule Change Proposal.
