

Wholesale Electricity Market Rule Change Proposal Submission

RC_2018_05: ERA Access to Market Information and SRMC Investigation Process

Submitted by:

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Date submitted:	3 February 2020

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

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

Alinta Energy welcomes the opportunity to provide a submission to the Rule Change Panel on its *Notice of the Minister's Decision Regarding the Amending Rules from Rule Change Proposal RC_2018_05*.

Alinta considers that the Minister for Energy's additions to the Amending Rules will improve the proposal's achievement of the Wholesale Market Objectives. Both the requirement for the ERA to notify Market Participants when it obtains their information under 2.13.3A, and the requirement for procedural fairness will improve the transparency of the compliance regime, creating opportunities for greater efficiency, over time.

Alinta suggests one administrative change to the Amending Rules. That is, for proposed clause 2.13.3B to reference 2.13.3, rather than 2.13.3A. As currently drafted, 2.13.3B references the compliance monitoring "systems and processes" that the ERA "must have in place in accordance with 2.13.3A." However, clause 2.13.3A does not contain this obligation – clause 2.13.3 does. Clause 2.13.3 requires the ERA to have "processes and systems in place to allow it to monitor Rule Participants' behaviour for compliance," whereas clause 2.13.3A obliges AEMO to facilitate these processes. Alinta's suggested change to the Amending Rules is provided in mark-up below.

- 2.13.3B. The Economic Regulation Authority must inform Rule Participants of specific market related data, information or documents provided by AEMO to the Economic Regulation Authority as part of the systems and processes the Economic Regulation Authority must have in place in accordance with clause 2.13.3A and the Economic Regulation Authority may perform this obligation by doing one or more of the following as applicable:
- (a) publishing on the Market Web Site details of market related data, information or documents to be periodically provided by AEMO as part of the systems and processes in place under clause 2.13.3A;
 - (b) where market related data, information or documents provided by AEMO as part of the systems and processes in place under clause 2.13.3A relates to a specific Rule Participant, informing that Rule Participant;
 - (c) where market related data, information or documents provided by AEMO as part of the systems and processes in place under clause 2.13.3A relates to a group of Rule Participants (more than one) informing those Rule Participants."