



12 November 2021

Energy Policy WA  
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Submitted via email: [submissions@energy.wa.gov.au](mailto:submissions@energy.wa.gov.au)

### **LOW LOAD RESPONSES - DPV MANAGEMENT DISCUSSION PAPER**

Alinta Energy appreciates the opportunity to provide feedback on EPWA's proposed reforms that would require new DPV systems of 5kW or less to have functionality allowing their curtailment at AEMO's instruction.

Alinta Energy broadly supports the intent of the proposal but makes the following comments for EPWA's further consideration.

Firstly, Alinta Energy considers that AEMO's use of DPV management should be predictable and transparent to the broader market. That is, to the extent AEMO's DPV management has implications for the WEM, WEM participants should not be caught off-guard by AEMO's interventions and have adequate prior opportunity to manage their portfolios accordingly.

Secondly, Alinta Energy recommends that the trigger for DPV management should be well-defined and consider whether the market can provide more efficient solutions. For example, DPV management should not substitute for ESS or NCESS and the triggers should avoid curtailing DPV where these services could deliver better outcomes or lower costs.

Thank you for your consideration of Alinta Energy's submission. If you would like to discuss this in more detail, please contact Oscar Carlberg at [oscar.carlberg@alintaenergy.com.au](mailto:oscar.carlberg@alintaenergy.com.au) or on 0409 501 570.

Yours sincerely,

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