

Enel X – Comments on Tranche 5 Wholesale Electricity Market Amending Rules

Thanks for the opportunity to provide feedback on the tranche 5 amendments. And thanks to Dora for helping with my understanding here.

Just two comments, on rule 2.29:

1. As discussed with Dora, it may be helpful to further amend 2.29.4 to make it clear that an interruptible load that is not co-located with storage does not need to register as a scheduled or semi-scheduled facility.
2. 2.29.5(G) implies that a Market Participant would need to reapply for reassociation when their contract with the customer load runs up and a new contract is entered into. Given there are likely to be a number of customer loads comprising a DSP or Interruptible Load on different contract lengths expiring at different times, a Market Participant might be constantly having to re-apply to reassociate loads – a process that involves both time and cost for AEMO and the Market Participant – for no clear purpose. It would be helpful to understand the policy rationale for defining an association period.

A more efficient approach would be to continue the association indefinitely unless terminated by the Market Participant or AEMO under other clauses in the rules. This is the approach taken for FCAS loads and WDRM loads in the NEM – in both cases the market participant must declare to AEMO that it has arrangements in place with the customer for the supply of the relevant services when classifying a load for FCAS/WDRM purposes, and must immediately notify AEMO if a load it has classified no longer satisfies this requirement. This puts the obligation on the market participant to ensure that it has a current contract in place with the customer, or to de-classify the load if that ceases to be the case.

If EPWA / AEMO decide to keep an association period, then the re-association application process and fee must scale down proportionally, particularly in cases where no aspect of the load, or its association, or the customer's participation will change under the new contract.

Regards

Claire Richards

Manager, Industry Engagement and Regulatory Affairs