

# Summary of Submissions

1 March 2022

WEM Procedure: Declaration of  
Bilateral Trades for the 2021 Reserve  
Capacity Cycle





# Important notice

## Purpose

AEMO to must publish, together with the final WEM Procedure, a summary of submissions received and the response of AEMO to issues raised in those submissions, with respect to amendments to Procedures required to be developed under:

- For clause 1.36.7(b) – Wholesale Electricity Market Amendment (Tranche 1 Amendments) Rules 2020.
- For clause 1.43.7(b) – Wholesale Electricity Market Amendment (Tranche 2 and 3 Amendments) Rules 2020.
- For clause 1.43A.6 – Wholesale Electricity Market Amendment (Tranche 5 Amendments) Rules 2021.

## Disclaimer

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# Submissions and AEMO's Response

The following written submissions were received as part of AEMO's stakeholder consultation.

Relevant Procedure Paragraph(s)	Summary of Submission	AEMO's Response
3.1.1	Stakeholder suggested that any amendment to dates under clause 4.14.3 be incorporated in paragraph 3.1.1.	In AEMO's view, clause 4.14.3 does not allow for changes to dates associated with this paragraph or process.
3.1.2	The stakeholder advised the drafting of this paragraph requires AEMO to publish a notice the business day before the WEMS system is opened and doesn't allow for any earlier notices. A suggestion was raised that it would be better if AEMO's notification specifies the date and that the system then is available from that date and time	AEMO publishes a Reserve Capacity timetable with all key dates and activities prior to the start of each Reserve Capacity Cycle (as detailed in section 4.1 of the WEM Rules). Timetables are located on the WEM Website.
3.1.3, 3.1.5, 3.1.10, 3.2.2, 3.4.1	Stakeholder raised feedback to request various clauses be amended to reduce repetition and increase clarity.	The paragraphs raised by the stakeholder are direct quotes from the WEM Rules. AEMO avoids changing any quotes or references from the WEM Rules to avoid creating inconsistency.
3.1.4	Stakeholder advised that the obligation for any submissions is paragraph 3.1.1	AEMO agrees with this submission and has amended the WEM Procedure.
3.1.8, 3.1.11	Stakeholder advised that paragraph 3.1.8 could be extended to cover the information in paragraph 3.1.11 and vice versa.	In AEMO's view, paragraph 3.1.8 relates to a confirmation through WEMS of a submitted trade declaration by a specified time. Paragraph 3.1.11 also relates to a confirmation through WEMS, however, places no obligation on AEMO regarding when the notification must be provided. AEMO believes the paragraphs remain separate.
3.1.9	Stakeholder believes this paragraph is a Market Participant's responsibility but shouldn't be an obligation. It was also raised that the mechanism to contact AEMO should be clearly specified.	AEMO agrees with this submission and has amended the WEM Procedure.
3.2.3	Stakeholder suggested paragraph references be updated if submission relating to paragraph 3.1.9 is accepted and amended.	AEMO agrees with this submission and has amended the WEM Procedure.
3.2.4	Stakeholder advised there is no option for the Market Participant to seek an extension.	AEMO does not believe there is sufficient time to allow for extensions if AEMO is to remain compliant with the 10 Business Day assessment period.
3.4.2	Stakeholder advised paragraph 3.4.2 is repetitive and could be simplified in line with the submission raised for paragraphs 3.1.8 and 3.1.11	AEMO agrees there may be repetition with reference to WEMS, however, all paragraphs refer to different processes:

Relevant Procedure Paragraph(s)	Summary of Submission	AEMO's Response
		<ul style="list-style-type: none"> <li>• Paragraph 3.1.8 – refers to a confirmation of receipt via an automated response within in WEMS (the system confirms receipt of submissions automatically and at the time of submission).</li> <li>• Paragraph 3.1.11 – refers to validations automated through WEMS (the system does not allow the Market Participant to submit an invalid trade declaration)</li> <li>• Paragraph 3.4.2 – refers to a notification which may be provided via WEMS (either within the system or a push notification from the system).</li> </ul> <p>AEMO believes the paragraphs remain separate.</p>