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Sent: Wednesday, 11 May 2022 9:35 AM
To: EPWA - Energy Markets <energymarkets@energy.wa.gov.au>
Subject: Feedback on tranche 6 amending rules

Hi there

Collgar has the following comments on the Tranche 6 amending rules:

ESROI

- Clause 6.3.1 includes the word 'determine' and phrase 'ESROI that AEMO expected will apply during the following seven Trading Days', which could be interpreted that AEMO is re-calculating new ESROI as frequently as daily. We understand that isn't the policy intent, nor the process outlined elsewhere in the WEM Rules (including clause 4.11.3A(a) and (b)) and the WEM Procedure developed under clause 4.11.3A(c).
- Collgar recommends rephrasing clause 6.3.1 to remove ambiguity and potential misalignment with clause 4.11.3A, the relevant WEM Procedure and the policy position that ESROI will change infrequently (and when they do they will be subject to at least 10 days consultation and set well in advance of the relevant Trading Day).
- However, *if* the intent is that AEMO can change the ESROI daily in response to system requirements, then Collgar is of the view that informing Market Participants of this at 8am on the Scheduling Day doesn't provide Market Participants sufficient time to consider and make changes to their bilateral positions prior to the 8:50 cut off (noting that at least some participants have earlier cut offs in their ESC/PPA to provide their position to their counterparty). Ideally Market Participants would be informed in the first half of the Trading Day prior to the Scheduling Day (although Collgar understands that there is a trade off between providing additional time to Market Participants and AEMO making its decision on more accurate information closer to real time).

Standing Bilateral Submissions

- Clauses 6.2A.4 and 6.2A.5 are unclear as to whether the cancellation relates to the specified Trading Interval for that week only, or for every subsequent week. That is, it is not clear whether the standing submission is only cancelled for (as an example) 2pm interval on Tuesday in the upcoming week, or 2pm interval for every subsequent Tuesday (until another change is made).
- Collgar recommends these clauses are reworded for clarity.

Cheers
Bec

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