

## 1 EXECUTIVE SUMMARY

Synergy would like to thank Energy Policy WA (EPWA) for the opportunity to provide feedback on the *Exposure Draft 2 – Tranche 6 Wholesale Electricity Market Amending Rules (Tranche 6B Rules)*.

## 2 MARKET SUSPENSION AND ADMINISTERED PRICING

The Explanatory Note on page 2 of Tranche 6B Rules provides high level details on the proposed policy position in relation to Market Suspension and Administered Pricing and some of the draft rules were presented at the TDOWG on the 24<sup>th</sup> of August. To enable Synergy to fully consider the proposed changes further clarity is required on: a) details on any transitional or future amendments for after the start of the new market (planned 1 October 2023); b) any required consequential amendments to the WEM Rules to allow for implementation and settlements; and c) when the detailed policy position and WEM Rules are going to be available for consultation. Synergy suggests that further consideration needs to be undertaken in relation to clauses 7.11D.1(b) and 7.11D.2(b) for fuel price shocks in light of the recent market suspension in the NEM.

## 3 PART 1 (AMENDING RULES TO COMMENCE ON GAZETTAL)

1) Part 1				
#	Rule ref.	Classification	Issue	Suggestion
1	1.36C.1	Typographical	Suggest the ordering of the definitions is revised following the amendments to as to retain the alphabetical ordering.	<p><b>1.36C.1.</b> In this section 1.36C:</p> <p><b>Amending Rules Commencement Day:</b> Means a date, other than the New WEM Commencement Day, by notice published in the Government Gazette, that a Specific Amending Rule commences.</p> <p><b>Commenced Amending Rule:</b> Means a Specific Amending Rule that has commenced on an Amending Rules Commencement Day.</p> <p>....</p> <p><del><b>Amending Rules Commencement Day:</b> Means a date, other than the New WEM Commencement Day, by notice published in the Government Gazette, that a Specific Amending Rule commences.</del></p> <p><b>WEM Participant:</b> Means the Coordinator, a Rule Participant and the Economic Regulation Authority.</p>

## 1) Part 1

#	Rule ref.	Classification	Issue	Suggestion
2	1.56.10	Typographical	Suggest the wording is revised for ease of reading	<b><u>1.56.10.</u></b> ... AEMO may amend the dates in the timeline if AEMO's expectation of <del>considers that</del> the New WEM Commencement Day <del>will be different from the date AEMO expects will be specified by the Minister at</del> <del>has changed since</del> the time the most recent timeline was published. The amended settlement timeline will take effect from the date the amended timeline is published.
3	3A.13.1 & 3A.12.2	Typographical	Synergy notes that the Explanatory Note underneath the heading "3A.13 Potential Relevant Generator Modifications" states that the bottom of clause 3A.13.1 has been moved to clause 3A.12.2, however the change to clause 3A.12.2 has not been made in the Tranche 6B Rules.	
4	4.10.1	Typographical	Suggests that the typographical errors of "41oC" being used instead of "41°C" are corrected.	<b><u>4.10.1(fA.)</u></b> ... ii. the maximum sent out capacity, net of embedded and Parasitic Loads, that can be guaranteed to be available for supply to the relevant Network from the Facility Electric Storage Resource when it is operated normally at an ambient temperature of <del>41oC</del> 41°C; ... <b><u>4.10.1(fD).</u></b> ... iii. the sent-out capacity, net of Parasitic Loads that can be guaranteed to be available for supply across the Electric Storage Resource Obligation Duration, to the relevant Network from each Electric Storage Resource when it is operated normally at an ambient temperature of <del>41oC</del> 41°C for each year of the expected life of the Electric Storage Resource, supported by manufacturer data; and ...
5	4.11.3A	Typographical	Suggest the wording is amending for ease of reading	<b><u>4.11.3A.</u></b> AEMO must: (a) <del>determine</del> in consultation with Market Participants <del>determine the Trading Intervals in each Trading Day that are classified as Electric Storage Resource Obligation Intervals, and, by the date and time specified in clause 4.1.8, publish on the WEM Website (which may be published in the Statement of Opportunities Report), by the date and time specified in clause 4.1.8 the Trading Intervals in each Trading Day that are classified as Electric Storage Resource Obligation Intervals;</del> ... ...
6	4.15.16	Typographical	Suggest the words "assessed in the NAQ model" are added to the end of the clause to provide clarity as to which Facilities the information is being provided for.	<b><u>4.15.16.</u></b> AEMO must publish the following information on the WEM Website by the date and time specified in clause 4.1.16A(d): (a) the Network Access Quantity Model Inputs; and (b) the Network Access Quantity or Indicative Network Access Quantity determined for each Facility <del>-assessed in the NAQ Model.</del>

1) Part 1

#	Rule ref.	Classification	Issue	Suggestion
7	11. Glossary: GIA Facility	Minor	<p>As the definition of “GIA Facility” is using the term “Constrained Access Facility” that will no longer be defined in the WEM Rules, Synergy suggests that a date for the WEM Rule book with the definition is added for completeness to allow for rule readers to refer to the actual definition if required.</p> <p>Further note that the term “Constrained Access Facility” is not defined in the current version of the WEM Rules although the term is being used in clause 3.21.2A).</p>	<b>GIA Facility:</b> A Facility that was a Constrained Access Facility (as previously defined in the WEM Rules dated TBA) for the purpose of certification of Reserve Capacity in one or more Reserve Capacity Cycles.
8	Appendix 3: Part A Step 2(b); and Part B Step 2(b)	Clarity	Synergy notes that the Explanatory Notes for the Appendix 3 change do not provide reasoning for the deletion of Step 2(b) that is undertaken in both Part A and Part B. Synergy would like to understand why this change has been made and seeks clarity as to why the amendment is required.	
9	Appendix 12	Moderate	<p>Synergy notes that several changes are proposed in Appendix 12 that will result in changes to the GPS Template. Existing generators are still working through approval processes for the GPS which may require Market Participants to resubmit GPS information to Western Power. Synergy suggests that the proposed changes to the template are not applied to existing generators while negotiations are still underway.</p> <p>If the additional information requirements are applied to existing generators, Synergy suggests that existing generators should be able to provide information in relation to the proposed changes via an addendum rather than updating its documentation to the new template, noting that the placement of the new items does not allow for a straight “copy and paste” solution and requires items to entered line by line. Synergy notes that the changes to the templates and increasing information requirements add time to the process for GPS approval.</p> <p>Further, Synergy would like to understand if Western Power will continue working through the approvals for existing generators GPS or whether they will halt the process given that a new template will be released.</p>	Suggest that any additional information is able to be provided as an addendum to the current GPS template for existing generators that are still progressing GPS approvals with Western Power
10	Appendix 12: A12.1	Clarity	For the defined term “Generator Performance Chart”, Synergy would like clarity as to how long a period is meant by “continuously” in relation to requirement “The chat shows the Reactive Power capability continuously achievable, subject to energy source availability ...”, and notes that the required time (depending on what is meant by “continuously”) may be too long and inconsistent with the Technical Rules.	
11	Appendix 12: A12.1	Clarity	For the defined term “Maximum Continuous Current”, Synergy notes that by providing options of either the “relevant Australian or ISO Standard for ...” does not make it clear as to which of these standards is being used to determine the value and may unintentionally create issues with different views and opinions as to what standard should be used.	

1) Part 1

#	Rule ref.	Classification	Issue	Suggestion
12	Appendix 12: A12.3.1	Minor	Synergy notes that the chart referred to in this section is usually provided by the manufacturer and that some units (older units in particular) may not have full data sets available. Synergy suggests that the requirement for this information is waived for existing generators if the information cannot be easily provided	Suggest the requirement is waived for existing generators if the information is not readily available.

4 PART 2. AMENDING RULES TO COMMENCE ON 1 JANUARY 2023

2) Part 2 (Section 2.16)

#	Rule ref.	Classification	Issue	Suggestion
13	2.16.2AA	Typographical	<p>Synergy notes that the wording of the new clause 2.16.2AA does not appear to align with the intent of the clause as stated in the Explanatory Note. The clause as drafted does not appear to provide an ability for AEMO to “negotiate on the types of information included (based on practicality and costs)” and only allows AEMO to negotiate with the ERA based on the timing.</p> <p>Further note that the typographical error of a missing “ ” and replace “2.16.2AA.When” with “2.16.2AA. When”.</p>	<p><b>2.16.2AA.</b></p> <p>When developing the list referred to in clause 2.16.2A(aA) prior to New WEM Commencement Day, and for any subsequent updates to that list, the Economic Regulation Authority and AEMO must:</p> <p>(a) agree <del>with AEMO</del> a proposed date and time for each item on the list to commence that allows reasonable time for AEMO to implement the monitoring changes required by the Economic Regulation Authority; and</p> <p>(b) consider the practicality and cost for AEMO to monitor each item on the list.</p>

5 PART 3. AMENDING RULES WITH TBA COMMENCEMENT DATE

3) Amending Rules with TBA Commencement Date				
#	Rule ref.	Classification	Issue	Suggestion
14	2.8.13	Moderate	<p>Synergy is of the view that clauses relating to the following items should remain protected provisions:</p> <ul style="list-style-type: none"> <li>Authority of the WEM Rules (clauses 1.1.1 and 1.1.2); and</li> <li>Market Objectives (clause 1.2.1).</li> </ul>	<p><b>2.8.13.</b> The following clauses are Protected Provisions: (a) clauses <b>1.1.1, 1.1.2, 1.2.1, 1.4.1, 1.4.2, 1.6.2, 1.7.3A, 1.8.1, 1.8.3, 1.8.4, 1.28.1 to 1.28.3, 1.28.5, 1.28.6, 1.42.2, 1.42.3, 1.42.5 to 1.42.7, 1.42.9, 1.42.10, 1.42.28, 1.43A.2, 1.43A.4 to 1.43A.6;</b> ... <b>2.28.5.</b> Subject to clauses <b>2.28.5A</b> and 2.28.16, a person registered as a Network Operator may be registered as a Rule Participant in another class or other classes. <b>2.28.5A. (new)</b> Clause 2.28.5 only applies to Rule Participants registered as a Market Participant prior to the New WEM Commencement Day.</p>
15	2.28.5	Clarity	<p>Synergy would like further clarity as to the reasoning for the reinstatement of this clause and how it is expected that the original proposed removal “may adversely affect current Market Participants.</p> <p>Synergy suggests that the scope for application of this clause is included in the WEM Rules, such as it only applies to Market Participants that were active at a set date and/or Western Power is excluded from the application of this clause.</p>	
16	Section 2.34, clauses 3.18.3 and 7.6.15, Appendix 1	Clarity	<p>Synergy notes that the TDOWG on the 24th of August it was noted that “Further work planned during consultation period on relationships between Standing Data and related data maintained by other processes, e.g. registration, certification, Intermittent Load parameters”. Synergy seeks clarity as to the expected timing of consultation on the further changes.</p>	
17	3.21.6	Moderate	<p>Synergy suggests the definition of the term ‘Outage o -1’ should be revised to expressly exclude submitted Outages that have subsequently been cancelled or rejected.</p> <p>Also note additional amendments are suggested to address the following:</p> <ul style="list-style-type: none"> <li>the indices of c, DI and o are not defined; and</li> <li>the definition of the term “<math>Q(c,DI,o)</math>” has accidentally been deleted and not replaced.</li> </ul>	<p><b>3.21.6.</b> AEMO must determine the Outage quantity for each Planned Outage and Forced Outage o for energy in each Dispatch Interval DI for each Separately Certified Component c of a Registered Facility that is a Non-Intermittent Generating System or Electric Storage Resource: <math>Q(c,DI,o)= RAC(c,DI,o-1)-RAC(c,DI,o)</math> where: (a) <math>Q(c,DI,o)</math> is the Outage quantity for Outage o of Separately Certified Component c in Dispatch Interval DI; (b) <del>(a)</del> <math>RAC(c,DI,0)</math> is equal to <math>MaxCap(c,DI)</math>; (c) <del>(b)</del> Outage o - 1 refers to the Outage of Separately Certified Component c relating to Dispatch interval DI that was submitted most recently prior to the submission time of Outage o and excludes outages that have subsequently been cancelled or rejected; ... (d) <del>(c)</del> <math>MaxCap(c,DI)</math> is: ... (e) <del>(d)</del> <math>RAC(c,DI,o)</math> is .....</p>
18	4.26.2AD(b)	Typographical	<p>Suggest the wording in the clause is amended to account for the value determined under clause 6.3A.3(g) being at the component level, whereas the value for STEMCAPO(f,t) is meant to be at the facility level.</p> <p>Note similar edit proposed below in item 19.</p>	<p><b>4.26.2AD.</b> (b) STEMCAFO(f,DI) is the estimate of total Capacity Adjusted Forced Outage Quantity determined for Separately Certified Components of <del>for</del> Facility f in Dispatch Interval DI determined on the Scheduling Day for the relevant Trading Day in accordance with Chapter 6 under clause 6.3A.3(g); and</p>

3) Amending Rules with TBA Commencement Date

#	Rule ref.	Classification	Issue	Suggestion
19	4.26.2AH(g)	Typographical	Suggest the wording in the clause is amended to account for the value determined under clause 6.3A.3(g) being at the component level, whereas the value for STEMCAPO(f,t) is meant to be at the facility level.  Note similar edit proposed above in item 18.	<b>4.26.2AH.</b> (g) STEMCAPO(f,t) is the estimate of the total Capacity Adjusted Planned Outage Quantity determined for Separately Certified Components of Facility f in Trading Interval t determined on the Scheduling Day for the relevant Trading Day in accordance with Chapter 6 under clause 6.3A.3(g); and
20	4.29.1B	Typographical	Synergy notes that calculation of the term TFMRCP does not align with the definition. Suggest the “divided by 12” part is brought within the formula so that the calculated value for TFMRCP is a monthly value rather than an annual value.	<b>4.29.1B.</b> The Facility Monthly Reserve Capacity Price for a Transitional Facility during a Transitional Reserve Capacity Cycle is the value calculated using the formula below <del>divided by 12</del> : TFMRCP = Min(max(Reserve_Capacity_Price, Trans_Floor), Trans_Ceiling) / 12 where: TFMRCP is the Facility Monthly Reserve Capacity Price for the Transitional Facility in the current Transitional Reserve Capacity Cycle for that Transitional Facility; ....
21	4.29.1CA	Moderate	Suggest that the annual price for Transitional Facilities is required to be published and retained on the AEMO website. Synergy notes that currently AEMO only publishes the Transitional Price for the most recent Capacity Cycle (noting that this is a value for a future year and not the current capacity year). Preferably AEMO retains the historic Trans_Floor, Trans_Ceiling and annual Capacity Price for Transitional Facilities with the historic RCP values in the spreadsheet “Historical Reserve Capacity Prices”.	<b>4.29.1CA.</b> AEMO must publish on the WEM Website the: (a) values determined for Trans_Ceiling and Trans_Floor in accordance with clause 4.29.1C that are used in the formula in clause 4.29.1B; and (b) value determined by multiplying the Facility Monthly Reserve Capacity Price for a Transitional Facility determined in clause 4.29.1B by 12.
22	Section 9.20	Clarification	Synergy would like clarity as to the notification process that AEMO will follow when issuing invoices under section 9.20. Further note that although the two Business Day turnaround period maybe suffice for standard invoices that Market Participants are expecting, additional time may be required given the unexpected nature of invoices issued under this section.	
23	10.2.5 and 10.4.19(g)	Moderate	Synergy considers that the aggregation of confidential data should allow for the Information Provider to consider if its confidential information is appropriately summarised as to avoid being easily estimated by others.  Synergy suggests that a new clause is created that requires consultation with the relevant Information Provider on the aggregation of confidential data and that clause 10.4.19(g) is made also made subject to the new clause.	<b>10.2.5A (new)</b> The Information Manager must consult with the relevant Information Provider and ensure that any confidential information cannot be easily interpreted from any aggregated or combined data that is to be published or released in accordance with clause 10.2.5.  <b>10.4.19.</b> Subject to clause 10.4.20 and section 10.5, the Information Manager must disclose Confidential Information that has been requested under clause 10.4.6 if: ... (g) subject to clause 10.2.5A, the Market Information can be disclosed in aggregated or anonymised form such that it does not reveal confidential information; or ...

3) Amending Rules with TBA Commencement Date

#	Rule ref.	Classification	Issue	Suggestion
24	10.2.10	Clarity	Synergy seeks clarity on the likely timeframe that the Coordinator will release the WEM procedure under this clause. Further Synergy suggests that the WEM Procedure is important to provide clarity to the market, and therefore the Coordinator “must” publish the WEM Procedure rather than “may”.	<b>10.2.10.</b> The Coordinator <del>must</del> <del>may</del> document in a WEM Procedure guidance for Information Managers to assist with determining the confidentiality status of Market Information in accordance with clause 10.2.3.
25	10.4.5	Typographical	Suggest Clause 10.5 is replaced with Section 10.5.	<b>10.4.5.</b> An Information Manager may, at its discretion, publish a list outlining its proposed classification for each type of Market Information it is responsible for. This classification shall not be binding on the Information Manager or the Coordinator in the case of a dispute under <del>Section Clause</del> -10.5.

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#	Rule ref.	Classification	Issue	Suggestion
26	10.4.10 and 10.4.11	Major	<p>Synergy is of the view that the drafting of these clauses does not align with the overall intent of the Market Information framework and suggests that drafting is reviewed and revised to ensure the underlying policy intent of the Market Information framework is maintained.</p> <p>The drafting of clause 10.4.10 appears to allow the Information Manager to determine that information that has previously been determined as confidential information could be considered as public information, and therefore not only released to the requesting party, but will also be released for any future requests. Further, the ability of the Information Provider to dispute the re-determination of the confidentiality status is erroneously limited by clause 10.4.11.</p> <p>Synergy is of the view that the policy intent of clause 10.4.11 is to allow for the Information Manager to release the confidential information to the <b>requesting party</b> if the party has requested the data in relation to one of the subclause items. However, the proposed drafting of clause 10.4.10(c), 10.4.11, 10.4.12 and 10.4.13 appears to suggest that any information that is requested for any of the reasons listed in clause 10.4.11 can have its confidentiality status changed to public and does not allow for the Information Provider to dispute the change in the confidentiality status. This could result in all confidential information effectively being released as public information.</p> <p>Suggested edits:</p> <ul style="list-style-type: none"> <li>Revise the placement of clause 10.4.11 to 10.4.9A and amend the clause such that it now allows for confidential information to be released to a requesting party if the request is in relation to the reasons listed.</li> <li>Implement a new clause that excludes the release of confidential information under clause 10.4.9A (formally 10.4.11) from disputes.</li> <li>Remove the reference to clause 10.4.11 from clause 10.4.10(c).</li> </ul> <p>Note that further amendments to clauses within this section will be required to align with suggested edits.</p>	<p><b>10.4.10.</b> If a submission was made under clause 10.2.7 that the Market Information requested under clause 10.4.6 is Confidential Information, and the Information Manager has deemed the Market Information to be Public Information and intends to release it under clause 10.4.9, the Information Manager must notify the Information Provider in writing, advising:</p> <p>(a) that it intends to release the Market Information, specifying the time and nature of the intended release;</p> <p>(b) why it is of the opinion that the Market Information is not Confidential Information; and</p> <p>(c) that the Information Provider, <del>subject to clause 10.4.11,</del> may lodge a dispute with the Coordinator within five Business Days if it disagrees with this assessment.</p> <p><b>10.4.11-10.4.9A</b> If the <del>The Information Provider</del> Information Manager considers that the Market Information requested under clause 10.4.6 is Confidential Information it may only release the Market Information to the requesting party if the Market Information <del>it may not lodge a dispute under clause 10.4.10(c) if the Market Information:</del></p> <p>(a) has been requested by the Coordinator or Economic Regulation Authority;</p> <p>(b) is required to be provided <b>to the requesting party</b> by law or a stock exchange having jurisdiction over the Rule Participant;</p> <p>(c) is required <b>by the requesting party</b> for court, tribunal or Electricity Review Board proceedings;</p> <p>(d) is being released <b>to the requesting party</b> to ensure the safety of personnel, equipment or the power system; or</p> <p>(e) <del>is required</del> <b>has been requested</b> by AEMO or the relevant Network Operator <b>and is required</b> to carry out their functions under these WEM Rules.</p> <p><b>10.4.9B. (new)</b> The Information Provider may not lodge a dispute under clause 10.4.22 if the Market Information is being released to a requesting party in accordance with clause 10.4.9A.</p>



3) Amending Rules with TBA Commencement Date

#	Rule ref.	Classification	Issue	Suggestion
27	10.4.20	Typographical	Suggest that a time period is applied to the notification provided to the Information Manager under this clause. Further the time period is not required in subclause item (c) as the timeframe to issue a dispute is defined within clause 10.4.22.is removed and replaced with “in accordance with clause 10.4.22”.	<b>10.4.20.</b> If an Information Manager intends to disclose Market Information requested under clause 10.4.6 in accordance with clause 10.4.19, it must first provide notice to the Information Provider in writing <b>within five Business Days</b> , advising: (a) that it intends to disclose the Market Information, specifying the nature of the intended disclosure; (b) why it is of the opinion the Market Information should be released in accordance with clause 10.4.19; and (c) that, if the Market Information is being released in accordance with clauses 10.4.19(a), 10.4.19(g) or 10.4.19(h), the Information Provider may lodge a dispute with the Coordinator <del>within five Business Days</del> <b>in accordance with clause 10.4.22</b> , if it disagrees with the Information Manager’s assessment.
28	10.4.23 and Section 10.5	Moderate	Synergy is of the view that a party should not be able to raise a notice of dispute under clause 10.4.23 in relation to Market Information that has already been determined under the dispute resolution process in clause 10.5 not to require disclosure. Ie, the same, or a different party, ought not to be able to seek a different outcome on the same issue.  Suggest that a new clause (10.5.4A) is added to make this clear (note that minor consequential amendments may be required in Section 10.5).	<b>10.5.4A (new)</b> <b>If a notice of dispute under clause 10.4 23 raises no new or different issues with respect to Market Information for which the Coordinator has already made a determination under clause 10.5, the Coordinator must dismiss such notice of dispute.</b>
29	10.4.25	Moderate	Synergy is of the view that the Information Provider should be notified under clause 10.4.25 if a dispute is raised by ‘a party’ in relation to requesting access to the Information Provider’s confidential information, and the Information Provider should have opportunity to consult with the Coordinator in relation to the dispute.	<b>10.4.25.</b> If a dispute is lodged in accordance with clause 10.4.24, then: (a) the Coordinator and the Information Manager must acknowledge the notice of dispute within one Business Day of receiving the notice; <b>(b) the Coordinator must provide notice to the relevant Information Provider that a dispute has been raised in relation to seeking access to its confidential data within one Business Day of receiving the notice;</b> <del>(c)</del> <b>(b)</b> the Coordinator must determine the dispute in accordance with section 10.5; and <del>(d)</del> <b>(e)</b> the Information Manager must not release or disclose the Market Information under dispute while the dispute is being determined.
30	10.4.26	Clarity	This clause seems to be in the wrong place, the clauses above this are in relation to “a party” disputing whereas this clause is in relation to the Information Provider disputing. Is this clause better placed as being numbered as clause 10.4.22A such that it will be below clause 10.4.22?	<del>10.4.26. 10.4.22A.</del> If the Information Provider does not lodge a dispute within five Business Days, or if a dispute is not allowed under clause 10.4.20(c), the Information Manager must disclose the Market Information within the timeframe referred to in clause 10.4.18(a).
31	Glossary	Moderate	Synergy is of the understanding that that definition for “Estimated Enablement Losses” will be reviewed and amended in relation to the Market Power Strategy, and is therefore unable to provide considered comment on the definition of this term.	
32	Glossary	Clarity	Synergy would like to understand the reasoning for creation of the new defined term “Network Quality and Reliability of Supply Code” as this term is not used anywhere within the rules. Suggest the term is deleted unless it is required.	<del><b>Network Quality and Reliability of Supply Code: The Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</b></del>

3) Amending Rules with TBA Commencement Date

#	Rule ref.	Classification	Issue	Suggestion
33	Glossary	Clarity	Synergy would like to understand how the term “Refund Exempt Outage Count” is transitioned over to the new market, as the count that is determined in part (c) of the definition is at a facility level, whereas part (d) is at a component level. For Facilities that have multiple components at the start of the new market, how will the Facility level outage count from part (c) be allocated to the components for the tracking of this term from 1 Oct 2023 onwards?	
34	Appendix 2A, 2.1(b)ii	Typographical	<p>The index f in clause 2.1(b)ii is not defined. Suggest that the clause is amended for clarity that f is a facility. For ease of read and continuity of drafting related clauses 2.2, 2.3 and 2.4 should also be amended</p> <p>Note: suggested amendments for clause 2.3 shown also include the edits suggested below in item 35.</p>	<p><b>2.1(b).</b> ... ii. the Facility Risk for facility f in Dispatch Interval DI as published under clause 7.13.1E(g)(i) is greater than the highest instantaneous output (in MW) of any electricity producing unit in the Energy Producing System supplying the Intermittent Load as provided under clause 2.30B.3(h); and ...</p> <p><b>2.2.</b> For each facility f which is a member of <del>in</del> Facilities(DI) or AdditionalIMLFacilities(DI), <del>f</del>, calculate the FacilityRisk(f,DI) to be: (a) where facility f is a member of AdditionalIMLFacilities(DI) or was included in Facilities(DI) under clauses 2.1(a) or 2.1(b) of this Appendix 2A, the Facility Risk for f in Dispatch Interval DI as published under clause 7.13.1E(g)(i); or (b) where facility f was included in Facilities(DI) under clause 2.1(c) of this Appendix 2A, the MWh output or consumption of the electricity producing unit in the Dispatch Interval immediately prior to Dispatch Interval DI as published under clause 7.13.1E(a)(v), multiplied by 12 to convert to MW.</p> <p><b>2.3.</b> Determine ApplicableFacilities(DI), which comprises those facility f’s which are members <del>f</del> of Facilities(DI) <del>Facilities (DI)</del> for which: <math>FacilityRisk(f,DI) \geq 10MW</math></p> <p><b>2.4</b> Determine AdditionalApplicableFacilities(DI), which comprises those facility f’s which are members <del>f</del> of AdditionalIMLFacilities(DI) for which: <math>FacilityRisk(f,DI) \geq 10MW</math></p>
35	Appendix 2A, 2.3	Typographical	<p>The second use of the term “Facilities(DI)” has a space in the middle of the term that should be removed.</p> <p>Note additional edits are shown to reflecting the amendments in item 34 above</p>	<p><b>2.3.</b> Determine ApplicableFacilities(DI), which comprises those facility f’s which are members <del>f</del> of Facilities(DI) <del>Facilities (DI)</del> for which: <math>FacilityRisk(f,DI) \geq 10MW</math></p>