# **Minutes**

Meeting Title:	Market Advisory Committee (MAC)
Date:	20 April 2023
Time:	9:30am -11:13am
Location:	Microsoft Teams

Attendees	Class	Comment
Sally McMahon	Chair	
Dean Sharafi	Australian Energy Market Operator (AEMO)	
Aditi Varma	Network Operator	Proxy for Zahra Jabiri
Genevieve Teo	Synergy	
Noel Schubert	Small-Use Consumer Representative	
Christopher Alexander	Small-Use Consumer Representative	
Geoff Gaston	Market Customer	
Timothy Edwards	Market Generator	Left at 11:02 am
Oscar Carlberg	Market Generator	Proxy for Jacinda Papps
Adam Stephen	Market Generator	
Tessa Liddelow	Market Generator	Proxy for Paul Arias
Peter Huxtable	Contestable Customer	
Patrick Peake	Market Customer	
Emma Forrest	Observer appointed by the Economic Regulation Authority (ERA)	Proxy for Rajat Sarawat
Dora Guzeleva	Observer appointed by the Minister	Proxy for Noel Ryan

Also in Attendance	From	Comment
Laura Koziol	MAC Secretariat	Observer
Shelley Worthington	MAC Secretariat	Observer
Tim Robinson	Robinson Bowmaker Paul (RBP)	Presenter
Grant Draper	Marsden Jacob Associates (MJA)	Observer

Also in Attendance	From	Comment
		Left at 9.50 am

Apologies	From	Comment
Martin Maticka	AEMO	
Zahra Jabiri	Network Operator	
Jacinda Papps	Market Generator	
Paul Arias	Market Generator	
Noel Ryan	Observer appointed by the Minister	
Rajat Sarawat	Observer appointed by the ERA	

Item	Subject	Action

#### 1 Welcome

The Chair opened the meeting at 9:30am with an Acknowledgement of Country.

The Chair noted that MAC members are to participate in the interests of the participant class they are appointed to represent.

#### 2 Meeting Apologies/Attendance

The Chair noted the attendance and apologies as listed above.

## 3 Minutes of Meeting 2023\_03\_16

The MAC accepted the minutes of the 16 March 2023 meeting as a true and accurate record of the meeting.

Action: The MAC Secretariat to publish the minutes of the 16 March 2023 MAC meeting on the Coordinator's Website as final.

MAC Secretariat

#### 4 Action Items

The paper was taken as read. The MAC noted that there were three closed action items and no open action items.

#### 5 Market Development Forward Work Program

The paper was taken as read.

# 6 Update on Working Groups

#### (a) AEMO Procedure Change Working Group (APCWG)

The paper was taken as read. Mr Sharafi noted that the APCWG will meet on 6 June 2023 to discuss the Supplementary Reserve Capacity WEM Procedure and expect to publish the final procedure by 30 June 2023.

#### (b) RCM Review Working Group (RCMRWG) Update

The MAC noted the paper and the minutes of the 2 March 2023 RCMRWG meeting.

Ms Guzeleva provided an update on the next steps for the RCMRWG:

- A paper combining the information paper for stage 1 of the review and the consultation paper for stage 2 of the review (the RCM Review Paper) is tabled for MAC discussion under Agenda Item 8.
  - The target is to publish the RCM Review Paper on 1 May 2023.
  - Consultation on the RCM Review Paper will be open for four weeks.
- Drafting of the Amending Rules for the stage 1 changes will commence while the RCM Review Paper is out for consultation, and for the stage 2 changes as soon as possible after consultation closes on the RCM Review Paper.
  - Consultation on the Amending Rules will be done in two stages, focusing first on the priority issues.

# (c) Cost Allocation Review Working Group (CARWG) Update

The Chair noted that the paper for Agenda Item 6(c) was missing from the MAC papers distributed on 18 April 2022 but was in the papers distributed on 13 April 2022 and included with the meeting invite on 20 April 2022. Ms Guzeleva indicated that EPWA will ensure that the complete set of papers are published on the MAC webpage.

The MAC noted the paper and the minutes of the 21 March 2023 CARWG meeting.

Ms Guzeleva noted that some issues arose at the CARWG meeting on 21 March 2023 regarding the proposed methodologies for allocating Frequency Regulation and Contingency Reserve Lower costs, primarily relating to the need for cost-benefit analysis.

- EPWA and AEMO subsequently met on 6 April 2023 to discuss these issues.
- Refined proposals will be presented at a CARWG meeting on 2 May 2023 and then a draft Information Paper will be drafted and presented to the MAC for discussion at its meeting on 8 June 2023.

#### 7 Rule Changes

# (a) Overview of Rule Change Proposals

The paper was taken as read. There were no updates.

8 RCM Review Information and Consultation Paper

The Chair introduced this agenda item as a review of the RCM Review Paper and indicated that the MAC is asked to:

- note the draft RCM Review Paper;
- note Review Outcomes from stage 1 of the RCM Review;
   and
- provide any further guidance to the Coordinator on the draft proposals from stage 2 of the RCM Review.

Ms Guzeleva indicated that the RCM Review Paper is in two parts:

- Part 1 is an information paper that indicates the outcomes from stage 1 of the RCM Review, which will not be open for consultation;
- Part 2 is a consultation paper for stage 2 of the RCM Review.

#### Consultation on Part 1 of the RCM Review Paper:

Ms Guzeleva provided an overview of the Summary Table of Review Outcomes from Part 1 of the Draft Information and Consultation Paper (Attachment 1).

Review Outcome (Proposal 2) (no specific product to manage minimum demand):

With regard to this Review Outcome, Ms Guzeleva noted that the option to introduce a specific product to manage minimum demand will be assessed in the Demand Side Response (DSR) Review noting that AEMO has called a Non-Co-optimised Essential Systems Services (NCESS) tender for a minimum demand service.

Review Outcome (Proposal 3) (introduce a new flexible capacity product):

Ms Guzeleva noted that this Review Outcome is relatively urgent because the ramping requirements of the SWIS are rapidly approaching unprecedented levels. Drafting of Amending Rules will commence in parallel with the stage 2 consultation.

- Mr Sharafi indicated that he is very supportive of the Review Outcome. Mr Sharafi noted that rule drafting and implementation will be challenging but should be a priority for AEMO over other issues, such as 5-minute settlement (5MS).
- Mr Carlberg agreed with Mr Sharafi.

Ms Guzeleva noted that there had not been recent discussions with industry regarding 5MS and that a WEM Reform Implementation Group (WRIG) meeting was scheduled in May 2023 to gather views on the implementation of 5MS.

Review Outcome (Proposal 4) (volatility in operational load and intermittent generation can be managed through ESS, so the Planning Criterion will not refer to volatility in load and intermittent generation output):

Ms Guzeleva indicated that facilities that are certified for providing the flexible capacity product should be capable of providing some, if not all, of the Frequency Co-Optimised System Service (FCESS). Therefore, there is an expectation that facilities certified for the flexible capacity product will be accredited for providing FCESS. Ms Guzeleva noted that, while this has been discussed previously, it had not been confirmed as an outcome until now.

In response to a question from Mr Carlberg, Ms Guzeleva clarified that facilities that are certified for the flexibility product will be required to be accredited for the FCESS that they are capable of providing.

 Ms Teo asked why this was now the outcome, considering that facilities offering the flexibility services and ESS would also need adequate price compensation and would be taking on more risk.

Ms Guzeleva noted that it was explained in the Stage 1 RCM Review Consultation Paper that facilities certified for the flexible capacity product would also be accredited for the provision of ESS that they can provide, and would be separately compensated for both services. Ms Guzeleva indicated that she was uncertain what Ms Teo's concern was and offered to discuss this offline with the Synergy representative on the RCMRWG (Mrs Bedola).

 Mr Carlberg added that, while he understood the intent of requiring flexible capacity product facilities to be accredited for ESS, there were some risks. Mr Carlberg indicated that he hoped that the Offer Construction Guideline and the outage procedure would make clear exactly what conditions come with accrediting for ESS. For example, to what extent facilities providing ESS would be required to log outages when they no longer want to provide ESS and to what extent this could be considered withholding capacity to exploit market power.

Ms Guzeleva noted that it was expected that facilities which provide the flexible capacity product would be capable of, and should be willing to provide ESS, and that she would like to hear what the impediments to this may be.

The Chair sought to clarify with Ms Teo whether her concern needed to be addressed before the RCM Review Paper was published or if it could be clarified in the Amending Rules.  Ms Teo indicated that she would discuss offline with Mrs Bedola and directly respond to EPWA.

In response to a question from Mr Stephen, Ms Guzeleva noted that AEMO would determine whether a facility is capable of providing the flexible capacity product, in line with its process for the peaking capacity product.

Review Outcome (Proposal 7) (leave the Excepted Unserved Energy (EUE) unchanged in the Planning Criterion):

Ms Guzeleva noted that EPWA has further considered the target EUE and plans to change the target EUE to 0.0002%, as indicated in section 5.4 of the RCM Review Paper.

Ms Guzeleva noted that, while it was previously considered unnecessary to change the target EUE percentage, it had now been confirmed in the NEM that the EUE percentage will be kept at a much lower percentage (0.0006%) to what is currently in the WEM (0.002%).

• Mr Alexander noted that there were nearly 40 Review Outcomes / Proposals in the RCM Review Paper and, while they address serious system security risks, they also have implications on affordability. Mr Alexander noted that it is important for the MAC not to lose sight of the impact on affordability for consumers when making decisions to address system security risks. Mr Alexander also highlighted the importance of the forthcoming DSR review and ensuring that as much efficiency is incentivised as possible.

Ms Guzeleva noted that, while the focus of the RCM Review was on reliability, she agreed with Mr Alexander that it should not lose sight of the cost impacts on consumers.

The Chair asked Mr Alexander if he considered that this needs to be highlighted in the RCM Review Paper.

 Mr Alexander noted that the RCM Review has proposed a very long list of discrete changes and that the MAC needs to consider the impact of each change on reliability and affordability. Mr Alexander suggested that the RCM Review Paper should include a section that explicitly recognises the affordability dimension.

Ms Guzeleva agreed and indicated that it also needs to be recognised there has been a shift in the risk appetite for electricity outages and that reliability is important to consumers (reduced reliability also comes at a cost to them).

Review Outcome (Proposal 8) (the Planning Criterion will include a third limb requiring AEMO to procure a flexible capacity):

Ms Guzeleva noted that:

- Mr Schubert had commented to EPWA that the use of 'cold start' and 'unsynchronised' was inconsistent in the paper and that EPWA would review this; and
- Mr Carlberg had sought to clarify whether the parameters for the flexibility product would still be consulted on in the consultation paper.

#### Ms Guzeleva noted that:

- the parameters had been consulted on and would be consulted again as part of the consultation on the Amending Rules; and
- percentages would not be hard coded in the rules and AEMO will determine the values annually in accordance with the relevant rules and procedures.

Review Outcome (Proposal 9) (the ERA will remain responsible for setting the Benchmark Reserve Capacity Price (BRCP) and guidance will be put in the WEM Rules):

 Mr Peake noted that he is concerned that the Reserve Capacity Price is linked to the amount of excess capacity. This discourages investors from providing capacity and this is a real danger to security of supply. He also noted that investors are at the mercy of the Synergy/Government investment decisions. Mr Peake suggested that there should be a dead-band for the price (+/- 5%) and offered to develop draft Amending Rules.

Ms Guzeleva agreed that this is a valid concern but that it is not within the Scope of Work for the RCM Review. However, consideration of this issue is on EPWA's agenda.

Review Outcome (Proposal 11) (use of gross vs net cost of new entry (CONE) to set the BRCP):

 Mr Carlberg considered that the gross vs net CONE decision is more of a policy decision and should not be determined in a procedure.

Ms Guzeleva pointed out that Part 2 of the paper which is for consultation proposes that use of gross vs net CONE and the choice of the reference technology are to be determined by the Coordinator, not the ERA.

Review Outcome (Proposal 13) (Capability Classes):

• Mr Peake noted that, with AEMO's interpretation of the 14-hour fuel requirement, participants need 14 hours of fuel and fuel transport for each day. Mr Peake argued that this is very expensive and is beyond what a peaking plant can generate for while staying under the emissions thresholds. This leads to a need for diesel backup and large costs for customers. Mr Peake considered that this needs to be revisited.

Ms Guzeleva responded that the 14-hour fuel requirement has been widely discussed, but there is significant reliability risk in changing the requirement.

 Mr Peake noted that the plants that are having fuel problems are those with 3 months' coal stockpiles, not the gas or diesel plants.

#### Ms Guzeleva noted that:

- there will likely be a duration gap by 2030 that will start smaller but will likely get to 14 hours, so changing the rules now would be short-sighted;
- Capability Class 2 will be introduced and that facilities who
  do not consider it to be efficient to comply with the 14-hour
  fuel requirement can apply for that class and get their
  capacity pro-rated;
- the RCM is about maintaining reliability and AEMO has been convinced year-on-year that the 14-hour fuel requirement is necessary;
- the duration gap is likely to start later in the day, EPWA will consider whether the procedures should be changed to shift the 14-hour fuel requirement to a different time; and
- this was not a new requirement and it would be an unwise policy decision to remove it at present.

The Chair asked whether the paper highlights the risks of removing the 14-hour fuel requirement versus the cost of keeping it.

Ms Guzeleva noted that AEMO had just reviewed and reinforced its relevant WEM Procedure in December 2022, which was brought to the 11 November 2022 MAC meeting (AEPC\_2022\_01).

 Mr Carlberg supported Mr Peake's comments and asked whether the fuel requirement could be linked to the length of the duration gap. Mr Carlberg considered that reliability is not addressed by the 14-hour fuel requirement because the requirement had been met during the certification process, but the fuel contracts had not during the recent issues.

Ms Guzeleva noted that AEMO had subsequently changed its procedure to strengthen the fuel requirement.

Ms Guzeleva pointed out that the Market Power Mitigation rules have been changed to require the ERA to allow pass through of costs to meet the 14-hour fuel requirement.

 Ms Teo noted that participants had not yet seen the ERA's revised Offer Construction Guideline, and while it is reflected in the WEM Rules, the ERA could still take an economic approach. Ms Guzeleva noted that the WEM Rules create an obligation for the ERA to permit the pass through of actual long-term take-orpay fuel contract costs and that rules prevail over any guidance.

In response to a comment from Mr Stephen, Ms Guzeleva noted that the 14-hour fuel requirement does not mean that the facility actually runs for 14 hours.

 Mr Schubert indicated that the ability to include take or pay contract costs in offer construction concerns him because consumers should not have to pay for inefficient contracts.

Ms Guzeleva noted Mr Schubert's concern but advised that the Minister has already made this determination and the rules are in place.

The Chair asked MAC members to provide EPWA with any suggested wording changes to the RCM Review Paper by the end of the day regarding the 14-hour fuel requirement, if they feel that the wording does not properly reflect their concerns.

 Ms Teo also sought further information on how Certified Reserve Capacity and the Reserve Capacity Obligation Quantities would work for hybrid facilities.

Ms Guzeleva indicated that treatment of hybrid facilities is a very important and complex issue, so it is a separate body of work.

Review Outcome (Proposal 16) (treatment of expert reports):

In response to a question from Mr Alexander, Ms Guzeleva noted that there was a material difference between performance of intermittent generators and the numbers provided in expert reports, and that inflated numbers impact on reliability.

## Part 2 of the RCM Review Paper:

The Chair noted that Market Participants will have the opportunity to provide formal responses to the proposals in Part 2 of the RCM Review Paper following publication of the paper.

Mr Robinson drew the MAC's attention to four of the proposals in Part 2 of the RCM Review Paper that are different from what the MAC has seen before.

#### Proposal D:

Mr Robinson indicated that Proposal D is about treatment of new meters in determining the Individual Reserve Capacity Requirement (IRCR) for the peak capacity product. Mr Robinson indicated that:

 the current IRCR methodology uses the demand of the new load during the four peak intervals in month n-3 and that these intervals are unlikely to reflect actual system stress; and

- the previous proposal to address this was to pick either the maximum historic load or the adjusted maximum allowed consumption; but
- this approach could significantly overestimate load and provide loads with the wrong incentives; so
- the proposal is now to set representative load for new meters based on the median demand in the four peak intervals of any prior month.

MAC members had no comment on this Proposal D.

#### Proposal S:

Mr Robinson indicated that:

- capacity refunds are currently paid to capacity providers; but
- it is proposed that capacity refunds should instead be refunded to consuming participants.

In response to a question from Mr Gaston, Mr Robinson confirmed that the proposal is for all capacity refunds to be paid to consuming participants, not just refunds from DSPs.

- Mr Alexander, Mr Gaston and Mr Schubert supported Proposal S. Mr Schubert argued that consumers should not have to pay for capacity twice – once to non-performing generators and again for the relevant replacement capacity.
- Mr Stephen indicated that refunds were initially paid to consuming participants and that it was subsequently decided to change this so that refunds are paid to capacity providers, and asked why a previous decision was proposed to be revised.

Ms Guzeleva indicated that the SWIS has changed substantially since 2016 when the allocation of rebates was last changed. There was substantial overcapacity in 2016, but now Supplementary Reserve Capacity (SRC) and Non-Co-Optimised Essential Services (NCESS) are being procured.

Ms Guzeleva noted that this issue was raised in two RCMRWG meetings and two MAC meetings, and the proposal is now up for consultation, so Market Participants are welcome to provide arguments and evidence opposing this change.

- Ms Liddelow did not support Proposal S and indicated that Shell would make a submission on this proposal.
- Mr Carlberg suggested that Proposal S has not been considered in detail and that Alinta would also make a submission on this proposal.

#### Proposal T:

Mr Robinson indicated that Proposal T is to change the Expected Unserved Energy (EUE) target from 0.002% to 0.0002%.

Mr Robison indicated that the consultation paper from stage 1 of the RCM Review indicated that the EUE target should not be changed because there is too much uncertainty in how the market will develop. However, this has been reconsidered because:

- it has become clear that the risk appetite in the market has changed, as indicated by the requirement for up to 830 MW NCESS for 2024/25:
- analysis has been done indicating that:
  - a 0.002% EUE would remain dominated by the first limb of the Planning Criterion; and
  - a 0.0002% EUE would bring the two limbs of the Planning Criterion closer together.
- Mr Sharafi supported Proposal T because it is much more aligned with modern society's expectations for reliability.
- Mr Carlberg asked how this proposal will impact the Relevant Level Method (RLM) – would more or less demand need to be added in the RLM process to meet the proposed new EUE target.

Mr Robinson indicated that there is some analysis in the paper indicating that:

- the load would need to be increased by less to reach the lower EUE;
- the fleet Effective Load Carrying Capability (ELCC) is stable across the range of EUEs that were analysed; and
- the fleet ELCC becomes more volatile at significantly lower EUEs because it will be driven by only one interval.
- Mr Alexander referred to his previous comments that the RCM Review needs to make sure that the costs for these sorts of changes do not result in too much cost for consumers.
- Mr Schubert noted that this proposed EUE is 10 times tighter than the current EUE and is one third of what applies in the National Energy Market, and supported Mr Alexander's comments that the RCM Review needs to make sure that it is not causing significant increased costs for consumers.

Mr Robinson pointed out that the analysis indicates that this change will just bring the EUE target to the same level as the other limb of the Planning Criterion (a 10% POE target plus reserve margin plus NCESS requirements) and will not bind until the mid-2040s.

Proposal U:

Mr Robinson indicated that Proposal U is consistent with the previous proposals regarding the determination of the BRCP, except that:

- o the Coordinator will review:
  - the appropriate reference technology for each capacity product;
  - the use of gross or net CONE; and
- the ERA will set the other parameters of the BRCP.
- Mr Schubert supported this proposal but indicated that some checks and balances may be needed because EPWA is an arm of Government, and Government does not always consider cost to consumers when making its decisions.
- In response to a question from the Chair, Mr Schubert indicated that this is a concern about appropriate governance and consultation.

Ms Guzeleva indicated that Proposal U will be enshrined in the WEM Rules and that the usual consultation requirements will apply to the Coordinator.

Mr Robinson indicated that previous comments on the question of gross vs net CONE stressed the need for visibility and consultation, with sufficient lead time, and that this will be taken on board.

The Chair summarised the discussion as follows, noting the discussion will be shared as guidance to the Coordinator:

- most of the proposals in Part 2 of the draft RCM Review Paper have been discussed by the MAC;
- the MAC has split views on Proposal S some members raised questions about the merits of changing the allocation of capacity refunds;
- some MAC members raised concerns about potential costs from a tighter EUE target under Proposal T, although it was noted that the new target would not bind for several years; and
- some MAC members commented on Proposal U that there is a need to ensure appropriate governance of the Coordinator's decisions on the reference technology and the use of gross vs net CONE in setting the BRCP.
- Mr Carlberg noted that the consultation paper has a large number of proposals and asked about prioritisation – can implementation be staggered, with high priority issues first, such as the flexibility product, and deferring lower priority issues, such as the DSP related changes.

Ms Guzeleva indicated that:

- rule drafting for the stage 1 Review Outcomes would be done in parallel with consultation on stage 2;
- some items from stage 2, such as the IRCR changes, will need to be implemented at the same time as the stage 1 items:
- the intent is to consult on the Amending Rules in two stages, with the higher priority items first; and
- while the DSP changes may not be priority for participants that are predominantly generators, these changes are a priority for DSP participants and for the WEM.

Ms Guzeleva pointed out that the RCM reforms are primarily about ensuring reliability for consumers and are not a vehicle to provide additional revenues to generators.

 Mr Peake noted that about 1,300 MW of base load capacity is about to be retired so, while there is a need to make sure that consumers are not over-charged, there is also a need to ensure that generators can earn adequate return or the required reliability will not be achieved.

Action: MAC members are to provide EPWA with suggested wording changes regarding the 14-hour fuel requirement if they feel that the wording in the consultation paper does not properly reflect their concerns by the end of the day.

MAC Members (20/04/2023)

#### 9 SRC Review

The paper was taken a read.

Ms Guzeleva indicated that:

- it is important to complete the SRC Review quickly because AEMO has indicated that it plans to commence another SRC process;
- the draft Amending Rules from stage 1 of the SRC review are with the Minister for approval and their making and commencement will be published in the Gazette shortly; and
- stage 2 of the SRC review has commenced.

Ms Guzeleva thanked Market Participants for their support in stage 1.

- Mr Sharafi indicated that AEMO is commencing a WEM
   Procedure change related to provision of information and
   responding to requests for assessment in response to the
   SRC Stage 1 Amending Rules, and that AEMO will engage
   directly with Western Power on this.
- Ms Varma confirmed that Western Power will engage in this process.
- Mr Sharafi indicated that AEMO intends to consult on the Procedure Change Proposal with the aim to publish an

Item	Subject	Action
	amended WEM Procedure by end of June 2023, so that it	
	can commence on 1 July 2023.	
10	General Business	
	No general business was discussed.	
	The next MAC meeting is scheduled for 8 June 2023.	

The meeting closed at 11:13am.