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9 December 2024

Ms Dora Guzeleva  
Director Wholesale Markets  
Energy Policy WA  
[energymarkets@demirs.wa.gov.au](mailto:energymarkets@demirs.wa.gov.au)

Dear Ms Guzeleva,

## Exposure Draft of WEM Investment Certainty Review and RCM Review Amending Rules

The Australian Energy Market Operator (AEMO) appreciates the opportunity to provide a submission on the Exposure Draft of the Wholesale Electricity Market (WEM) Investment Certainty Review (WIC Review) and Reserve Capacity Mechanism (RCM) Review Amending Rules (WIC/RCM Exposure Draft).

The body of this submission provides a high-level overview of implementation considerations (including WEM Procedure changes), and issues identified. Further detail on specific drafting is provided in Attachment 1, with minor typographical and cross-referencing errors provided in Attachment 2.

Given the complexity of the rule changes and the short time available to review, AEMO has undertaken best endeavours to review the WIC/RCM Exposure Draft as comprehensively as possible.

### Implementation challenges

Due to the compressed time between release of the WIC/RCM Exposure Draft and proposed rules commencement date, several implementation challenges have been identified, including:

- Insufficient time to enact system changes for some policy initiatives (e.g. new rules, or where the Reserve Capacity Reform Amending Rules have changed).
- Where implementation remains possible, increased resourcing, cost and risk associated with undertaking changes based on the WIC/RCM Exposure Draft.

AEMO noted in its [submission](#) on the WIC Review Initiatives 1 and 2 Consultation Paper that the proposed changes to the Reserve Capacity Price curves could be implemented for the 2025 Reserve Capacity Cycle (under certain conditions), and following a review of the WIC/RCM Exposure Draft, this remains the case. However, the implementation of the 10-year fixed price guarantees require greater system impacts than was understood based on the policy intent. Based on a preliminary implementation assessment, AEMO expects to be able to implement the 10-year price guarantee for Capability Class 1 Facilities that provide the Flexible Capacity product, but AEMO is unable to implement the product for Capability Class 1 and 2 Facilities fuelled by renewables, or for Electric Storage Resources (ESR) capable of maintaining the ESR Duration requirement over the forward 10-year horizon within the timeframe needed to meet the requirements of the 2025 Reserve

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Capacity Cycle. These policy outcomes require more significant system changes that cannot be implemented in the March and June 2025 RCM system releases. More detailed information on the relevant clauses and their implementation impact is provided in Attachment 1.

Changes to several Flexible Capacity clauses (since the gazetted Reserve Capacity Reform Amending Rules in December 2023) will also require implementation in the March and June 2025 Reserve Capacity Mechanism system releases.

Due to the timing constraints, AEMO will be required to progress many system changes based on draft WEM Rules, with the added risk that the relevant clauses may change again following stakeholder feedback. Should this risk eventuate, it could jeopardise AEMO's ability to undertake the system changes in the timeframes required, and/or impose additional cost and project risk.

AEMO understands that gazettal of the relevant rules may not occur until early January 2025, but that some changes are intended to commence by 15 January 2025 (e.g. for the 2025 Reserve Capacity Cycle Expressions of Interest (EOI) process). To allow for adequate time to prepare materials based on gazetted rules, AEMO intends to delay the publication date of AEMO's Request for EOI process under clause 4.1.1C until 31 January 2025. It is hoped this additional time will be adequate to provide certainty for AEMO and for Market Participants, who may be considering new development projects.

### **Impacted WEM Procedures**

AEMO has undertaken a preliminary assessment and identified that the WIC/RCM Exposure Draft and related rule packages will require amendments to at least 20 WEM Procedures. While AEMO had assessed and planned for some of these WEM Procedure changes based on the previous Reserve Capacity Reform Amending Rules, the volume and extent of changes are more significant under the WIC/RCM Exposure Draft.

Further work is required to determine the timeframes for each WEM Procedure, considering resourcing requirements, visibility needs for Market Participants, rule commencement, and the potential flexibility to defer some WEM Procedures if there is a surplus of Flexible Capacity. AEMO will provide more granular information on these matters to assist in drafting amendments to the WIC/RCM Exposure Draft that enable the deferral of the WEM Procedures to an appropriate date that will also support minimum consultation requirements.

### **WIC/RCM Exposure Draft review challenges**


The WIC/RCM Exposure Draft amends many clauses from several rule packages that have been gazetted but not commenced, or have been subject to consultation but not gazetted, and are therefore not present in the current WEM Rules. These include the [Reserve Capacity Reform Amending Rules](#) (ministerial instrument), [Miscellaneous Amendments 3 Exposure Draft](#), and [Miscellaneous Amendments 3 Amending Rules](#) (ministerial instrument). The WIC/RCM Exposure Draft did not include the related clauses from these related rule packages.

As a result, reviewing the rules has been a complex and challenging process, requiring shifting between these multiple related rule packages, the WIC/RCM Exposure Draft, and the current WEM Rules. Further, the ministerial instruments are provided in an 'instructions based' format that differs substantially from a rules format, adding additional complexity in reviewing.

Acknowledging that time for review is limited if these rules are to be gazetted in time for implementation in the 2025 Reserve Capacity Cycle, it is noted there may be unidentified issues or errors that will require subsequent amendments or management following rule commencement.

If you would like to discuss any of the matters raised in this submission, please contact Mena Gilchrist, Manager WA Regulatory Affairs at [mena.gilchrist@aemo.com.au](mailto:mena.gilchrist@aemo.com.au).

Yours sincerely,

DocuSigned by:  
  
C57917E37272401...

Nicola Falcon

**Interim Executive General Manager WA**

Attachments:

*Attachment 1 – Summary of AEMO key issues and comments*

*Attachment 2 – AEMO minor drafting comments on the Exposure Draft*

## Attachment 1: Summary of AEMO key issues and comments

WEM Rules clause reference	AEMO comments
<b>PART 1 – WIC REVIEW</b>	
<p><b>Clause 4.9.9</b> <b>Clause 4.10.1</b></p>	<ul style="list-style-type: none"> <li>AEMO notes that these clauses will require system changes to enable the provision of information in the application for Certified Reserve Capacity.</li> <li>Clause 4.10.1 requires the system changes to be in place before 14 April 2025. Given AEMO’s current workload and the insufficient time between a rule gazettal and the deadline to release the software changes, AEMO is unable to commence these changes for the 2025 cycle.</li> </ul>
<p><b>Clause 4.9.9(b)</b></p>	<ul style="list-style-type: none"> <li>AEMO notes the following example that could be possible under the current drafting of clause 4.9.9(b):                             <ul style="list-style-type: none"> <li>(b) A Market Participant provides evidence under clause 4.10.1(e)(v)(3) or 4.10.1(fA)(vi)(1).</li> <li>(c) AEMO advises under clause 4.9.9(b) that they are fuelled by renewables and they receive the 10-year fixed price under clause 4.14.1CB.</li> <li>(d) The next year, the Market Participant provides the statement that they do not want to be considered for renewable fuelled (and thus don’t provide evidence).</li> <li>(e) As no evidence has been provided, AEMO cannot advise anything under clause 4.9.9(b) and the Market Participant therefore retains the 10-year fixed price status.</li> </ul> </li> <li>AEMO suggests changes are required to clause 4.14.1CC to address this potential scenario and has recommended drafting under 4.14.1CC below (which includes drafting to address other concerns with this clause). These changes should be drafted at the same time as the proposed changes to clauses 4.10.1(e)(v)(3) and 4.10.1(fA)(vi) outlined below.</li> </ul>
<p><b>Clause 4.9.10(c)(iii)</b></p>	<ul style="list-style-type: none"> <li>AEMO questions the need for further information in a WEM Procedure as the drafting includes an extensive list of requirements. AEMO has a substantial number of WEM Procedures and considers that any unnecessary WEM Procedures should be avoided to minimise cost and compliance obligations on AEMO and Market Participants.</li> <li>While AEMO’s preference is to retain the current list in clause 4.9.10(c)(iii) without a WEM Procedure, if EPWA wishes to retain the requirement for a WEM Procedure, AEMO recommends limiting the procedure head of power to “how AEMO will assess whether a Facility is fuelled by Eligible Renewable Energy Sources.” The requirements for AEMO’s assessment could then be split into a separate clause.</li> <li>AEMO recommends that contractual information provided by Market Participants to AEMO under proposed clause 4.9.10(c)(iii)(1), 4.9.10(c)(iii)(3), and 4.9.10(c)(iii)(4) is</li> </ul>

	<p>classified as Confidential Information under the WEM Rules. Without this addition, AEMO may be required to provide the contracts in part, or full, if requested by any parties under Chapter 10 of the WEM Rules.</p>
<p><b>Clause 4.10.1(e)(v)(3)</b> <b>Clause 4.10.1(fA)(vi)</b></p>	<ul style="list-style-type: none"> <li>• AEMO suggests these clauses are amended so that evidence is only required from Facilities that are nominating or continuing with the 10-year fixed price. Removing the requirement for a statement from a Market Participant that does not want to be assessed as renewable-fuelled would make the process more efficient and reduce the administrative burden on both Market Participants and AEMO.</li> <li>• Clause 4.10.1(e)(v)(3) should be amended to state that it does not apply to ESR, since ESR can be eligible for the 10-year price guarantee without renewable sourced fuel supplies if it can maintain output for at least as long as the ESR Duration Requirement over the 10-year Electricity Statement of Opportunities (ESOO) horizon.</li> <li>• Clause 4.10.1(fA)(vi) states that ESR must provide evidence that it is fuelled by renewable sources and can also meet the ESR Duration Requirement over the 10-year ES00 horizon. AEMO understands that the policy intent is for ESR to meet one, but not both, of these requirements. As such, the opening statement in the clause should not refer to renewable fuels (noting that ESR can meet the eligibility requirements without this) and that the ‘and’ should be replaced with an ‘or’ at the end of sub-clause 4.10.1(fA)(vi)(1).</li> </ul>
<p><b>Clause 4.14.1CA(g)</b> <b>(4.14.1CA(i))</b></p>	<ul style="list-style-type: none"> <li>• AEMO notes that subclause (g) regarding Demand Side Programmes should read subclause (i).</li> <li>• AEMO suggests combining this subclause with 4.14.1CA(b):                       (b) “(b) the Facility Technology Type is part of a Facility that is not a Non-Scheduled Generator <u>or Demand Side Programme.</u>”</li> </ul>
<p><b>Clause 4.14.1CB</b></p>	<ul style="list-style-type: none"> <li>• AEMO suggests the wording is adjusted to reflect that only new Facilities can access the 10-year price guarantee, including addressing the reference in clause 4.14.1CB(b)(ii) to “currently” maintaining output Electric Storage Resources, which is not applicable for new Facilities.</li> </ul>
<p><b>Clause 4.14.1CC</b></p>	<ul style="list-style-type: none"> <li>• AEMO suggests using “Flexible Capacity Credits” under clause 4.14.1CC(a) instead of “Flexible Certified Reserve Capacity” as AEMO cannot validate under this clause until it has already determined the Capacity Credits and calculated the prices.</li> <li>• AEMO understands that sub-clauses (a) – (c) are intended to be mutually exclusive, with the final sub-clause (d) applying in addition to one of the sub-clauses (a) – (c). However, the current drafting does not reflect this.</li> <li>• AEMO proposes the amendments outlined below to address the two issues identified above, and the issue raised under 4.9.9(b).</li> </ul>

	<ul style="list-style-type: none"> <li>• “4.14.1CC. Where a Facility Technology Type within a Facility has been classified as a Fixed Price Component under clause 4.14.1B(b) in a previous Reserve Capacity cycle and:             <ul style="list-style-type: none"> <li>(b) (a) the Facility Technology Type has been nominated under clause 4.14.1CB(a) and the Facility Technology Type does not hold Flexible Capacity Credits in the current Reserve Capacity Cycle; or</li> <li>(c) (b) the Facility Technology Type has been nominated under clause 4.14.1CB(b)(i) and AEMO has advised the applicant under clause 4.9.9(b) that AEMO considers that the energy sources used by the Energy Producing System have not been or will not be from Eligible Renewable Energy Sources, or the applicant has not provided sufficient evidence under clause 4.10.1(e)(v)(3) or 4.10.1(fA)(vi)(2) to allow AEMO to make a determination under clause 4.9.9(b); or</li> <li>(d) (c) the Facility Technology Type has been nominated clause 4.14.1CB(b)(ii) and the Electric Storage Resource cannot currently maintain output at the level of its Peak Certified Reserve Capacity for at least as long as the highest expected ESR Duration Requirement for any year in the Long Term PASA Study Horizon published in the Electricity Statement of Opportunities for Year 1 of the Reserve Capacity Cycle in which the Facility Technology Type was first awarded Peak Certified Reserve Capacity, or the applicant has not provided sufficient evidence under clause 4.10.1(fA)(vi)(1) to allow AEMO to make an assessment of compliance; and</li> <li>(e) (d) the Fixed Daily Peak Reserve Capacity Price for that Fixed Price Component is greater than or equal to the Floating Daily Peak Reserve Capacity Price, then</li> <li>(f) in the current Reserve Capacity Cycle and all future Reserve Capacity Cycles, AEMO must no longer treat that Facility Technology Type as if it had been nominated as a Fixed Price Component under clause 4.14.1B(b), but instead must treat it as if it had been nominated as a Fixed Price Component under clause 4.14.1B(a).”</li> </ul> </li> </ul>
<p><b>Appendix 3 “prioritisation order”</b></p>	<ul style="list-style-type: none"> <li>• AEMO notes there is an inconsistency between the proposed new requirement and clause 4.11.4. The change implies that at least for a Scheduled Facility or Semi-Scheduled Facility, AEMO would only assign a Capability Class at the Component level. However, this is not clear in clause 4.11.4 (e.g. under (a) it refers to Facility but not component). AEMO’s current implementation is to only classify Capability Class for a Facility.</li> <li>• AEMO notes this change would require significant system changes, which cannot be accommodated in time for the June 2025 RCM system releases.</li> <li>• As there are no hybrid Facilities with Non-Intermittent Generating Systems (they are all currently in Capability Class 1), AEMO suggests delaying commencement of this</li> </ul>

	change, as well as making consequential changes to clause 4.11.4 to remove any inconsistency.
<b>PART 2 – RCM REVIEW</b>	
<b>Peak Demand Side Programme Dispatch Requirement (note: not in Exposure Draft)</b>	<ul style="list-style-type: none"> <li>As the Relevant Level Method rules will not be commenced in 2025, AEMO suggests that EPWA implements a transitional provision to manage how the Peak Demand Side Programme Dispatch Requirement is determined for the 2025 Reserve Capacity Cycle.</li> <li>Without a change to the definition to include the 2025 Reserve Capacity Cycle, AEMO would be required to determine the value based on a methodology that does not yet exist.</li> </ul>
<b>Clause 1.XX.E</b>	<ul style="list-style-type: none"> <li>AEMO notes clause 1.XX.E does not extend to WEM Procedures associated with the clauses referenced in that section. This will mean AEMO is required to develop the WEM Procedures on commencement of the rules, irrespective of whether the WEM Procedures are required at this time. As noted in the body of this submission, limitations in timing of the Procedure Change Process and resourcing limitations will prevent AEMO from undertaking the full range of WEM Procedures on commencement of the rules.</li> </ul>
<b>Clause 2.29.5AB Clause 4.20.16A</b>	<ul style="list-style-type: none"> <li>AEMO notes that the drafting in these causes conflict. Clause 2.29.5AB requires the Market Participant to allocate Capacity Credits and clause 4.20.16A requires the Market Participant to notify AEMO to allocate the Capacity Credits.</li> <li>AEMO suggests amending the clauses so that clause 2.29.5AB allocates the Associated Loads in accordance with the Capacity Credits notified to AEMO under clause 4.20.16A.</li> </ul>
<b>Clause 2.29.5AE Clause 2.29.5AF</b>	<ul style="list-style-type: none"> <li>AEMO notes clause 2.29.5AE does not fit neatly into chapter 2 and does not provide instructions on how or where the Capacity Credit reduction applies.</li> <li>AEMO suggests clause 2.29.5AE is moved to clause 4.20.16B to indicate that any Capacity Credits remaining unallocated with the Demand Side Programme certified under clause 4.10.1B, will be reduced by AEMO to zero.</li> <li>AEMO suggests clause 2.29.AF is also moved to clause 4.20.16B.</li> </ul>
<b>Clause 2.33.3 (Application Fee)</b>	<ul style="list-style-type: none"> <li>AEMO notes that a single ‘one off’ Application Fee will not effectively cost-recover for the significant work that must be undertaken by AEMO to implement system changes and maintain an annual process to enable Demand Side Programme aggregator participation (noting that they do not pay Market Fees).</li> <li>AEMO recommends that further consideration is given to alternative cost-recovery mechanisms (e.g. introducing an annual fee). Without such changes, the costs of DSP aggregator participation will be cross-subsidised by other Market Participants.</li> </ul>
<b>Clause 4.4B.9(f)</b>	<ul style="list-style-type: none"> <li>AEMO recommends amending clause 4.4B.9(f) to read:</li> </ul>

	<p>(b) “the list of substation names as used in RCM Limit Advice, and all associated Transmission Node Identifiers, that are expected to be in service on 1 October of Year 3 of the Reserve Capacity Cycle.”</p> <ul style="list-style-type: none"> <li>This change is required as there is currently no way in which to link Transmission Node Identifiers to substation names used in Limit Advice, which is needed to publish the list of Transmission Node Identifiers at which aggregators cannot locate Demand Side Programmes.</li> </ul>																														
<p><b>Clause 4.10.1(dB)</b></p>	<ul style="list-style-type: none"> <li>AEMO strongly suggests this change is removed as the sub-clause appears to be unnecessary but will require a system change that has not been planned. The minimum stable loading level at the component level is only required when a Market Participant is applying for Flexible Certified Reserve Capacity, which is already covered under clause 4.10.1(fE)(vii).</li> </ul>																														
<p><b>Clause 4.10.1(fE)</b></p>	<ul style="list-style-type: none"> <li>AEMO suggests the previous subclause 4.10.1(fE)(xi) that was deleted is reinstated, so the requirements cover switching from discharging to charging, and from charging to discharging (absent in current drafting). This is needed to ensure AEMO has the information required to make the assessment under clauses 4.10.1A(b)(iii) 1 and 2. It also ensures AEMO is not required to remove any already completed system changes before the March 2025 release.</li> </ul>																														
<p><b>Clause 4.11.1(bD)</b></p>	<ul style="list-style-type: none"> <li>AEMO notes the change in this clause cannot be commenced until the new Relevant Level Method rules commence.</li> </ul>																														
<p><b>Clause 4.20.16A (note: not in exposure draft but gazetted in Reserve Capacity Reform Rules in December 2023)</b></p>	<ul style="list-style-type: none"> <li>In conducting implementation planning AEMO has identified an issue with clause 4.20.16A that does not seem to reflect the intent. Under the following scenario the rules are contradictory: <table border="1" data-bbox="485 1227 1347 1429"> <thead> <tr> <th>Facility</th> <th>Traded Peak CRC</th> <th>NAQ</th> <th>Peak CC</th> <th>Traded Flex CRC</th> <th>Flex CC</th> </tr> </thead> <tbody> <tr> <td>Facility A</td> <td>150</td> <td>100</td> <td>100</td> <td>100</td> <td>100</td> </tr> <tr> <td><b>Component</b></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>A1</td> <td>100</td> <td></td> <td>50</td> <td>100</td> <td>100</td> </tr> <tr> <td>A2</td> <td>50</td> <td></td> <td>50</td> <td></td> <td></td> </tr> </tbody> </table> </li> <li>Under clause 4.20.16A the Market Participant for Facility A must nominate how they wish to split the 100 Peak Capacity Credits between component A1 and A2, the only limitation being that the nomination cannot exceed their Peak Certified Reserve Capacity. The Market Participant in this example has nominated an even split of 50 to A1 and 50 to A2.</li> <li>Under clause 4.20.17A(a), given the Flexible Capacity Credits = Flexible Certified Reserve Capacity, AEMO has an obligation to assign 100 Flex Capacity Credits to A1. This would mean the Peak Capacity Credits are greater than Flexible Capacity Credits.</li> </ul>	Facility	Traded Peak CRC	NAQ	Peak CC	Traded Flex CRC	Flex CC	Facility A	150	100	100	100	100	<b>Component</b>						A1	100		50	100	100	A2	50		50		
Facility	Traded Peak CRC	NAQ	Peak CC	Traded Flex CRC	Flex CC																										
Facility A	150	100	100	100	100																										
<b>Component</b>																															
A1	100		50	100	100																										
A2	50		50																												

<p><b>Clause 4.25.3D</b>  <b>Clause 4.25.3E</b>  <b>Clause 4.25.4CC</b></p>	<ul style="list-style-type: none"> <li>AEMO notes the DSP Load can be negative, so it is possible that the shortfall results are negative. AEMO suggests the formula in each of this clause needs to have a protection for a negative (i.e. <math>\max(0, x)</math>).</li> </ul>
<p><b>Clause 4.28.5B</b></p>	<ul style="list-style-type: none"> <li>AEMO questions why “for use in the Relevant Level Method” has been removed from this clause, especially if the intention is to implement the changes to the Relevant Level Method before the changes to the Peak Individual Reserve Capacity Requirement.</li> </ul>

## Attachment 2: Minor comments and typographical errors

WEM Rules clause reference	AEMO comments
<b>PART 1 – WIC REVIEW</b>	
Clause 4.5.12(d)	<ul style="list-style-type: none"> <li>AEMO suggests the end of the subclause has a “;” instead of a full stop.</li> </ul>
Clause 4.5.13(eC)(iv)	<ul style="list-style-type: none"> <li>AEMO recommends changing “forecast” to “a forecast of the.”</li> </ul>
Clause 4.9.10(aA)	<ul style="list-style-type: none"> <li>AEMO recommends aligning the commencement date of this clause with the Relevant Level Method changes.</li> </ul>
Clause 4.9.10(c)(iii)	<ul style="list-style-type: none"> <li>“Intermittent Generator Output” is not a defined term. AEMO recommends defining or removing capitalisation.</li> </ul>
Clause 4.10.1(fA)(v)	<ul style="list-style-type: none"> <li>AEMO recommends making consequential changes to clause 4.10.1(e)(vi) for consistency.</li> </ul>
Clause 4.10.1(fA)(vi)(2)	<ul style="list-style-type: none"> <li>The clause reference “4.14.1.1C(b)” appears incorrect.</li> </ul>
Clause 4.29.1A(f)	<ul style="list-style-type: none"> <li>AEMO recommends adding “and” after the semi colon.</li> </ul>
Clause 4.29.1CA	<ul style="list-style-type: none"> <li>Subclauses (a) and (b) seem to duplicate the obligations in clause 4.20.5AA.</li> </ul>
Fixed Price Component Definition	<ul style="list-style-type: none"> <li>AEMO recommends removing “Peak” from “Peak Fixed Price Component” as it is not a defined term.</li> </ul>
Appendix 3: Determination of NAQ	<ul style="list-style-type: none"> <li>AEMO suggests adding “then” after the semicolon in the underlined green section.</li> </ul>
<b>PART 2 – RCM REVIEW</b>	
<b>Clause 4.13A.11(b)</b> (note: not in exposure draft but gazetted in Reserve Capacity Reform Rules in December 2023)	<ul style="list-style-type: none"> <li>Note that reference to clause 4.13A.11 in paragraph heading 18 appears incorrect, AEMO believes it should read 4.13.11A.</li> <li>Further, reference to clause 4.13.11(b) in paragraph 18.1 appears incorrect. AEMO believes it should read 4.13.11A(b).</li> </ul>
Clause 2.29.5B	<ul style="list-style-type: none"> <li>“Capacity Purchaser Payments” is not a defined term. AEMO recommends defining or removing capitalisation.</li> </ul>
Clause 1.XX.E(v)	<ul style="list-style-type: none"> <li>AEMO recommends adding “;” after the “clause 4.1.23C(b).</li> </ul>
Clause 2.29.5AE	<ul style="list-style-type: none"> <li>Recommend deleting extra space after “to registered Demand Side Programmes.”</li> </ul>

<b>Clause 2.29.5AF</b>	<ul style="list-style-type: none"> <li>AEMO suggests removing “subject to clause 4.10.1B in Year 1 of a Reserve Capacity Cycle, to registered Demand Side Programmes” for readability.</li> </ul>
<b>Clause 2.29.5AH</b>	<ul style="list-style-type: none"> <li>AEMO suggests amending to “previously nominated under clause 2.29.5AG” for clarity.</li> </ul>
<b>Clause 4.10.(fE)(iix)</b>	<ul style="list-style-type: none"> <li>Roman numeral “iix” is incorrect – AEMO suggests changing to “vii.”</li> </ul>
<b>Clause 4.10.1A(a)(ii)(1)</b>	<ul style="list-style-type: none"> <li>AEMO notes there is a “,” is missing after “nameplate capacity.”</li> </ul>
<b>Clause 4.11.3A(c)</b>	<ul style="list-style-type: none"> <li>AEMO suggests deleting reference to “4.113A(aB)” as it is just a publication cause.</li> </ul>
<b>Clause 4.11.3C</b>	<ul style="list-style-type: none"> <li>AEMO suggests deleting the “,” as it is no longer a list.</li> </ul>
<b>Clause 4.11.1(bl)</b>	<ul style="list-style-type: none"> <li>AEMO suggests the clause cross-reference here should be clause 4.12.2(d).</li> </ul>
<b>Clause 4.13A.5A</b>	<ul style="list-style-type: none"> <li>AEMO suggests changing reference to “in sub-clause (a)” to “in clause 4.13A.5A(a)” for consistency with the WEM Rules.</li> </ul>
<b>Clause 4.13A.5B</b>	<ul style="list-style-type: none"> <li>AEMO suggest clause reference “clause 4.13.5A” should be changed to “clause 4.13A.5A.”</li> </ul>
<b>Clause 4.25.3H</b>	<ul style="list-style-type: none"> <li>AEMO suggests removing reference to “clause 4.10.1A(a)(iii)(5)” as it has been removed from the WEM Rules.</li> </ul>
<b>Clause 4.25.4CC</b>	<ul style="list-style-type: none"> <li>Clause 4.25.4CC(a)(i) – suggest deleting the “,” and replace with “;” and delete the “,” after the “and”.</li> <li>Clause 4.25.4CC(a)(iii) – suggest adding a “;” before the “and”.</li> <li>Clause 4.25.4CC(a)(iv) – suggest deleting the full stop and replace with a “;”.</li> </ul>
<b>Clause 4.25.9(h)</b>	<ul style="list-style-type: none"> <li>AEMO suggests adding this new subclause 4.25.9(h) to the list of subclauses in subclause 4.25.9(a), under which AEMO must endeavour to conduct Reserve Capacity test without warning.</li> </ul>
<b>Clause 4.26.2CA</b>	<ul style="list-style-type: none"> <li>AEMO suggests amending “Marlet” to “Market.”</li> </ul>
<b>Clause 4.28.5B</b>	<ul style="list-style-type: none"> <li>If the intention is that these requirements must be outlined in the Individual Reserve Capacity Requirement WEM Procedure, AEMO suggests amending clause 4.28.12 to include this clause.</li> </ul>
<b>Clause 7.13.5</b>	<ul style="list-style-type: none"> <li>Suggest also amending clause 7.13.1E(d) to reflect the new terminology in this clause – e.g. “instructed” instead of “requested.”</li> </ul>
<b>DSP Constrained Quantity</b>	<ul style="list-style-type: none"> <li>The previous defined term “DSP Constrained Withdrawal Quantity” is also used in clauses 7.4A.9, 7.4A.8 and 7.4A.13 – AEMO suggests making amendments to update to the new defined term and conducting a broader review of the WEM Rules for any others missing.</li> </ul>

<p><b>New Notional Wholesale Meter</b></p>	<ul style="list-style-type: none"> <li>• The removal of this definition impacts other parts of the gazetted Reserve Capacity Reform Amending Rules – there are seven instances in the ministerial instrument that AEMO recommends should also be amended and replaced with the relevant new definitions.</li> </ul>
<p><b>Appendix 4</b></p>	<ul style="list-style-type: none"> <li>• AEMO recommends deleting second “.” from heading.</li> <li>• AEMO suggests changing “if Appendix 10” to “of Appendix 10” in Step 10 and add a “,” at the end.</li> </ul>
<p><b>Use of “Unadjusted Baseline Energy”</b></p>	<ul style="list-style-type: none"> <li>• AEMO has not identified this term as a defined term in the WIC/RCM Exposure Draft or related instruments – suggest it is removed from Appendix 4.</li> </ul>
<p><b>Appendix 5</b></p>	<ul style="list-style-type: none"> <li>• AEMO suggests replacing the full stop with a “; and” at the end of subclause (b).</li> </ul>
<p><b>Appendix 10</b></p>	<ul style="list-style-type: none"> <li>• 2.1 – suggest moving the “and” in subclause (a) to after subclause (b).</li> <li>• 2.2 – suggest changing “t(d))” to “t(d)))”. Insert “of Trading Day l” after “Trading Interval t” in subclause (b).</li> </ul>