

3 October 2024

Ms Dora Guzeleva  
Director, Wholesale Markets  
Energy Policy WA  
Lodged by email to [energymarkets@dmirs.wa.gov.au](mailto:energymarkets@dmirs.wa.gov.au)

Dear Ms Guzeleva

**Individual Reserve Capacity Requirement Adjustment for Associated Loads - Exposure Draft Amending Rules**

Change Energy fully supports the proposed changes to the Wholesale Electricity Market (WEM) Rules. We consider each of the proposed changes will be beneficial to the market and should deliver improved market outcomes overall and help reduce costs to customers.

**Double Dipping**

Change Energy believes that there has been a significant amount of double-dipping in the certification of loads for the purposes of registration in DSP, NCESS and SRC programs. We are concerned that in certifying loads that are already reducing demand to lower their IRCR will not provide any additional response when called upon in high demand periods. Where this is case, the customer can potentially reduce their IRCR costs and receive a payment for being registered in a demand-response program.

As with all changes to market arrangements, issues may arise through implementation. We expect that EPWA will work with AEMO, as well as industry, in the development of the policy positions and drafting of exposure WEM Rules. We expect EPWA will continue this consultative approach and will make any necessary changes to concepts and drafting to deliver effective market outcomes at the lowest practical cost.

If you have any questions or would like to arrange a meeting to discuss any aspect of this submission, please contact me on 0401 903 210 or at [Geoff.Gaston@changeenergy.com.au](mailto:Geoff.Gaston@changeenergy.com.au).

Yours Sincerely,



Geoff Gaston

CEO

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