

6 December 2023

Energy Policy WA
Level 1, 66 St Georges Terrace
Perth WA 6000



WEM Rules Exposure Draft

Dear Dora,

Thankyou for the opportunity to comment on the exposure draft. There are many valuable amendments proposed which we generally support.

However, there is one amendment which seems a bit puzzling and we do not understand its purpose. The proposed 4.9.2A "A Market Participant may only apply for the certification of Reserve Capacity for Facilities, or components of a Facility, that can simultaneously exist." seems to be a bit out of place.

In effect, this rule addition would prevent variations of facilities to be submitted into the Certification process. We understand the certification process purpose is for AEMO to assess whether the proponent has a technically able solution to provide capacity. Therefore, similar to the EOI process which encourages variants to be submitted, the certification process should also encourage variants to be submitted.

It is at the next stage where security is provided and bilateral trade declarations made where proponents should be forced to select the final configuration. There is only benefit and no harm to the market to allow proponents to submit perhaps more than one configuration for certification. It is at the "commitment" stage that clearly one configuration needs to be preferential otherwise it cannot be considered to be committed.

Requiring only one variant of a facility or component of a facility to be submitted at too early a stage may restrict options and make it more difficult for proponents to participate. Allowing as much time to a proponent to settle on the right decision is beneficial for the market.

We understand that without this proposed rule, there may be a few additional variants for the Reserve Capacity Team to assess but we feel that the additional effort on the team's side would also be matched by the significant effort expended in putting the documentation together by the proponent. Therefore it is unlikely a proponent would go to the effort of submitting many different variants unless it was absolutely necessary to do so.

We are happy to discuss this further if required.

Yours Sincerely,

Ben Tan
CEO
Tesla Corporation