

8 May 2025

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



Tranche 8 Amending Rules

Dear Dora,

Thanks for the opportunity to comment on the Tranche 8 Amending Rules. We commend you for the significant work that has gone into this and support the ADG and ESR Duration Requirement protection amendments.

We only have one specific comment to query:

Proposed Rule Amendment to 4.13.13 – We are unclear as to the purpose of waiting for the relevant Capacity Year to occur and a test be witnessed for the Reserve Capacity Security to be released. If a new Facility comes online prior to the beginning of the relevant Capacity Year and has tested as required, then the market should support the early entry and not penalise the Facility with having to wait until the 1 October of the year to apply for the security release. We believe that as soon as the Facility has operated at a level equivalent to its RL for two Trading Intervals, then it should be able to apply for the release.

The purpose of the Security is to ensure the delivery of the capacity. If the capacity is successfully delivered to the market, then the Security has served its purpose. Holding onto it unnecessarily merely increases the cost of delivery (albeit a minor cost) and is unclear in purpose.

The Facility will then have to undergo a further test in the subsequent period between 1 October to 31 March in any case.

Yours Sincerely,

Ben Tan
CEO
Tesla Corporation