

19 November 2025

Ms Dora Guzeleva
Director Wholesale Markets
Energy Policy WA
energymarkets@demirs.wa.gov.au

Dear Ms Guzeleva,

Exposure Draft of Electricity System and Market Rules – Tranche 9

The Australian Energy Market Operator (AEMO) appreciates the opportunity to provide a submission on the Exposure Draft of Electricity System and Market Amending Rules – Tranche 9 (Exposure Draft).

AEMO has reviewed the Tranche 9 Exposure Draft and Addendum and has provided detailed drafting comments and suggestions in Attachment 1 to better facilitate implementation of the rules. Due to the compressed timeframes and complexity introduced by multiple amending instruments, this review has been on a best endeavours basis and AEMO notes there may be some issues we have not identified.

Schedules 1 to 4

AEMO acknowledges the collaboration with Energy Policy WA to address some of the issues identified throughout Schedules 1 to 4 of the Exposure Draft. The changes published in the Addendum will rectify some of these issues and help facilitate the effective implementation of system changes by AEMO, to ensure better outcomes for the market.

AEMO generally supports the proposed changes to section 2.29 in Schedule 1 around the association of Non-Dispatchable Loads with Demand Side Programmes (DSP) and Interruptible Loads and notes the benefits that will be provided from systemisation. This extends to the additional changes highlighted in Schedule 1 in the Addendum, which have addressed prior concerns.

It should be noted that reviewing and processing applications for associating Non-Dispatchable Loads with a DSP will potentially be resource intensive for AEMO. If there are large volumes of applications there will likely be cost implications (which would ultimately be passed on to the market), and it may be difficult for AEMO to meet the ten Business Day notification requirement in new clause 2.29.5D.

Schedule 5

The proposed changes in Schedule 5 seek to provide a more effective mechanism for Market Participants to disagree with meter data changes affecting settlement, and do not currently have a commencement date. AEMO notes that disagreement requests will be actioned directly with Western Power instead of going through AEMO (as occurs under the existing process). AEMO supports the intent of these provisions and will work with Western Power to determine the relevant system and process updates prior to committing to implementation timeframes.

Implementation Timing and Challenges

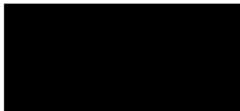
Many of the proposed changes in Schedule 1 of the Exposure Draft and Addendum are essential to facilitate system changes that are currently being implemented by AEMO. We therefore strongly support the commencement date of 1 January 2026 and highlight there will be associated implementation risks if there is a delay to gazettal, or departure from the current drafting.

The proposed changes to the Non-Temperature Dependent Load Ratio in Schedule 1A of the Addendum are scheduled to commence on 1 March 2026. Participants at the Transformation Design and Operation Working Group on 12 November 2025 requested guidance from AEMO on the cost to implement the changes (to enable an assessment of the overall benefit to Market Participants). As noted at the meeting, AEMO is unable to commit to costs at this early stage. However, based on a preliminary assessment of the impact to AEMO's systems and processes the implementation effort is estimated to be around one month and would also require some re-prioritisation of AEMO's existing reform delivery. Additional implementation effort would then be required to rework the same changes as part of the full suite of Appendix 5 amendments due to commence with Schedule 4 on 1 October 2027.

Finally, AEMO's initial assessment of the Exposure Draft has identified several WEM Procedures that will require amendment. Currently this includes the Settlements; Minimum Eligibility Requirements for Flexible Certified Reserve Capacity; Meter Data Submissions; and Facility Registration, De-registration and Transfer WEM Procedures. AEMO appreciates Energy Policy WA's inclusion of transitional clause 1.70.2, which provides additional time to progress the Procedure amendments impacted by Schedule 1, in recognition of the large WEM Procedure load we are currently working through.

If you would like to discuss any of the matters raised in this submission, please contact Sarah Graham, Manager WA Regulatory Affairs at sarah.graham@aemo.com.au.

Yours sincerely,



Kirsten Rose

Executive General Manager WA

Attachments:

Attachment 1 – AEMO drafting comments and suggestions

Attachment 2 – Editorial suggestions and typographical errors

Attachment 1: Feedback and clarifications on drafting

Schedule 1	
Clause	Comment / suggestion
1.71.1 and 1.71.2	<ul style="list-style-type: none"> These clauses have been included in Schedule 1 to ensure they are gazetted ahead of Schedule 1A commencing. However, if Schedule 1A does not proceed these rules will need to be removed from the gazettal document.
2.29.5AD	<ul style="list-style-type: none"> Clause 2.29.5AD allows for the Market Participant to maintain the association of a Non-Dispatchable Load with a DSP in the event that the Network Operator changes the Transmission Node Identifier (TNI) during the Capacity Year. However, a Market Participant must apply to associate the DSP with a Non-Dispatchable Load by 30 June (clause 2.29.5AB(b)) for the Capacity Year commencing on 1 October. It appears to AEMO that, should the Network Operator change the TNI between 1 July and 30 September of that year, the drafting of clause 2.29.5AD would only apply until 30 September, rather than for the applicable Capacity Year. AEMO recommends amending clause 2.29.5AD to address this matter, and can provide recommended drafting if required.
2.29.5AO	<ul style="list-style-type: none"> AEMO considers that the drafting of clause 2.29.5AO could be amended to more explicitly capture instances in which a Market Participant provides a TNI in its application for Certified Reserve Capacity (CRC), and then seeks to change the TNI to one that is published on AEMO's list under clause 4.3.1(b) for the relevant Capacity Year. As currently drafted the clause may capture an existing DSP that has a TNI in Standing Data, but seeks certification under a different TNI, where that TNI is on the published list. In this instance, the DSPs TNI would be expected to change in Standing Data to a TNI on the published list. AEMO recommends redrafting the clause to: <p>“2.29.5AO. A Market Participant must not change the TNI provided for a Demand Side Programme under clause 4.10.1(f)(viii) to a Transmission Node published by AEMO under clause 4.3.1(n) for the relevant Capacity Year.”</p>
2.29.5B(a) and 2.29.5B(f)	<ul style="list-style-type: none"> With a potential significant increase in applications under clause 2.29.5B (including for non-contestable premises where verification is more challenging) AEMO considers that it cannot practically review all contracts, or verify evidence that that each non-contestable customer has an Interval Meter installed, without significant increases in resourcing requirements and/or breaching timing obligations under clause 2.29.5B of the ESM Rules.

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	<ul style="list-style-type: none"> Noting that clause 2.29.5AL already places an obligation on the Market Participant to ensure compliance with the Metering Code, AEMO requests that the words “evidence satisfactory” are replaced with the words “details acceptable to” (consistent with clause 4.10.1(e)(v)(2)). This will reduce the burden on AEMO when verifying this information, thereby minimising timing and cost implications. Further, AEMO recommends that the word “associated” under clause 2.29.5B(f) is replaced with alternative language to avoid confusion with the association of Non-Dispatchable Loads with DSPs under this and adjacent rules.
2.29.5E(a)	<ul style="list-style-type: none"> Consistent with AEMO’s feedback on clause 2.29.5B(a) and 2.29.5B(f) above, we request the word “evidence” is replaced with the words “details or information” in this sub-clause. The addition of the word “information” links to the language used in clause 2.29.5C referenced in this clause.
2.29.5E(b)	<ul style="list-style-type: none"> AEMO considers that clause 2.29.5E(b) is not required and should be deleted. This is because clause 2.29.5B(f) requires the Market Participant to provide evidence satisfactory (or “details acceptable to”, as recommended above) to AEMO that an Interval Meter has been installed. If this evidence is not satisfactory, the application is not accepted as it is not considered a valid application. Should removal of the sub-clause not be enacted, AEMO notes that as a separate entity to Western Power, it cannot practically verify compliance with the Metering Code and would rely on information provided by the Market Participant or Western Power to signal compliance. Similar to AEMO’s comments on clause 2.29.5B(f), obtaining and verifying such information is also expected to be excessively time-consuming, and therefore costly to implement. This will be exacerbated if substantial volumes of applications for residential premises are realised, noting that the National Meter Identifier will not already exist within AEMO’s systems (signalling an Interval Meter exists).
3.11A.2(a)	<ul style="list-style-type: none"> AEMO requests this sub-clause is amended to clarify the time period over which this the assessment is to apply.
4.10.1B	<ul style="list-style-type: none"> While this clause is not subject to amendment under the Exposure Draft, the clause relates to clause 2.29.5AB and is therefore relevant to this submission. While clause 4.10.1B refers to “a Demand Side Programme with more than one Associated Load”, the association of the load with the DSP occurs after the certification of Reserve Capacity. As such, AEMO recommends amending these words in clause 4.10.1B to “for a Demand Side Programme for which it intends to have more than one Associated Load”.
4.11.1(j)(ii)	<ul style="list-style-type: none"> Minimum Consumption levels for a DSP may be provided under <u>both</u> clauses 2.29.5B(c) and 4.10.1(f)(i)(2), and may be different values (note: clause 2.29.5B(c) is the current consideration, and clause 4.10.1(f)(i)(2) is the expectation in 3 years, when Capacity Credits are expected to commence). As such, AEMO seeks an adjustment to the sub-clause to clarify the priority order to be used in these circumstances.
4.11.1B(a)	<ul style="list-style-type: none"> AEMO recommends that significant maintenance is defined in the ESM Rules to avoid ambiguity. AEMO suggests the following definition:

	<p>“Significant Maintenance: maintenance that reasonably requires the Forced Outage of a Facility to maintain its operation in accordance with the ESM Rules, for which the relevant Rule Participant could not reasonably anticipate or prepare.”</p>
4.11.4A	<ul style="list-style-type: none"> AEMO seeks clarification on the Capability Class to assign under this clause in instances where there is no single Technology Type with the highest Peak Certified Reserve Capacity value (e.g. where the values are equal).
9.21.2	<ul style="list-style-type: none"> AEMO notes that regulation 45 of the ESM Regulations may be somewhat unclear in its application to civil penalty provisions. If the Rule Participant pays the Civil Penalty Amount and is also disputing the civil penalty through the Electricity Review Board, AEMO would be required to distribute the payment to the relevant Market Participants under clause 9.21.2, and then recover those values to reimburse the Market Participant in the event that the dispute was successful. This would be inefficient and may have other impacts on Market Participants. AEMO considers that this would also complicate the payment of interest (e.g. it is unclear whether AEMO should recover the values with interest). AEMO considers that it may be better to allow AEMO to hold the funds for the duration of the appeal window (28 days), and then either distribute the values if no appeal is made or continue to hold the value until any appeal has concluded. In the absence of a change to this clause, to reduce this risk AEMO can consider (subject to legal advice) the potential to amend its Settlements Procedure to allow for consultation with the Market Participant following the payment of a Civil Penalty Amount, to confirm that a dispute is not intended. In the event that the Market Participant intends to dispute following payment, AEMO can then consider holding the payment until a determination is made.
Schedule 1A	
Appendix 5	<ul style="list-style-type: none"> As expressed in AEMO’s comments in the body of the submission, AEMO notes that changes under Schedule 1A of the Addendum present implementation challenges if implemented on 1 March 2026.
Schedule 2	
Appendix 9, step B.9.1(e)(ii)	<ul style="list-style-type: none"> As AEMO is only using meter data in this step, and therefore won’t have full Historical Output data for all Candidates, we won’t be able to calculate the Facility Average Performance Level for all the Candidates in Commercial Operation. AEMO suggests deleting the publication requirement in this Step and retaining the requirement in Step B.9.2(e)(iii), so AEMO can publish Facility Average Performance Level for all Candidates at the same time.
Schedule 3	
2.29.5AH(b), 2.29.5AH(b)(i); and 2.29.5AH(b)(i)(2)	<ul style="list-style-type: none"> AEMO notes that the clause implies approval will always be granted, which may not be the case. As such, AEMO recommends including the words “Subject to clause 2.29.5AI” at the commencement of the sub-clause. Further, AEMO recommends amending 2.29.5AH(b)(i) to remove the words “the later of”, and following, to add the words “if no nomination is made under clause 2.29.5AH(b)(i)(1),” to the beginning of clause 2.29.5AH(b)(i)(2).

	<p>This amendment will resolve a potential issue whereby a Market Participant nominates a date under clause 2.29.5AH(b)(i)(1) that is prior to date under clause 2.29.5AH(b)(i)(2), but because that date nominated is not the later of the two, AEMO would have to apply the date under clause 2.29.5AH(b)(i)(2).</p>
4.13A.16 and 4.25.4CE	<ul style="list-style-type: none"> AEMO is not able to readily implement the requirements in clause 4.25.4CE and understands that EPWA intends to remove this clause. AEMO considers that implementing the payment obligation under new clause 4.25.4CD is best done by amending clause 4.13A.16, which is consistent with other payment obligations. Consequently, AEMO recommends the following drafting amendments to clause 4.13A.16 (commencing 1 October 2026) as: “The payment obligations under clauses 4.13A.15, 4.13A.15A or 4.25.4CD may be satisfied by AEMO drawing upon the DSP Reserve Capacity Security for the relevant registered Demand Side Programme, or the single DSP Reserve Capacity Security that AEMO holds under clause 4.13A.5A in accordance with clause 4.13A.5B.”
4.25.2B(d)(i) and 4.25.2B(d)(ii)	<ul style="list-style-type: none"> AEMO recommends amending this sub-clause to refer to the “immediately preceding period”, consistent with clause 4.25.2B.
4.25.4	<ul style="list-style-type: none"> AEMO requests that this clause is amended to replace the words “from the second Trading Day following the Scheduling Day on which AEMO determines that the second Reserve Capacity Test was failed” with the words “from the second Trading Day after the second Reserve Capacity Test was failed:” This change aligns with the functionality of AEMO’s systems, which automatically reduce Capacity Credits under this clause two Trading Days after the Reserve Capacity Test was failed, rather than from the date AEMO determines as such. For clarity, in the event that there is a delay in AEMO’s determination, the reduction in Capacity Credits would be shorter than two days from the determination, and in some cases may be backdated.
4.25.4F and 4.24.3(c)(i)	<ul style="list-style-type: none"> AEMO notes that clause 4.24.3(c)(i) should prevent a Market Participant with a Non-Dispatchable Load from applying for Supplementary Capacity if that Market Participant held Capacity Credits in relation to the load in the current or immediately preceding Capacity Year. Notwithstanding, AEMO agrees that clause 4.25.4F is beneficial to provide clarity, but requests that the clause is amended to capture any form of Capacity Credit reduction (e.g. 2.29.5AE, and 2.29.5AM). AEMO has also identified a related issue with the use of “current Capacity Year” in clause 4.24.3(c)(i), which could be interpreted as either the year in which AEMO tenders for Supplementary Capacity or the year in which AEMO requires the Supplementary Capacity. Under the first interpretation there is the potential for a DSP to cancel the association of a Non-Dispatchable Load from its already certified DSP, and offer that capacity as part of the Supplementary Capacity process (provided the Market Participant did not hold capacity in relation to the load in the immediately preceding Capacity Year).

	<ul style="list-style-type: none"> To avoid this potential, AEMO recommends updating clause 4.24.3(c)(i) to specify that the Market Participant "does not hold Peak Capacity Credits for the Capacity Year in which the Supplementary Capacity is being sought, or the immediately preceding Capacity Year."
4.25.9(b)	<ul style="list-style-type: none"> AEMO suggests including a new sub-clause under this clause to ensure appropriate notification is given for Electric Storage Resources. AEMO considers that a two-hour notice period would allow for syncing and enabling wet compression. AEMO proposes the following drafting: “(bA) in the case of an Electric Storage Resource, ensure a notification time of two hours prior to conducting a test;”
4.26.1(e)(iii)(1) and 4.26.1(e)(iii)(5)	<ul style="list-style-type: none"> AEMO notes that under the companion version of the ESM Rules for 1 October 2026, the calculation under sub-clause 4.26.1(e)(iii)(1) includes RD(f,t), described in sub-clause 4.26.1(e)(iii)(5). However, Relevant Demand can only be determined for a DSP Dispatch Event, and therefore the input RD(f,t) into clause 4.26.1(e)(iii)(1) is not possible to determine.
4.26.1AC(b)	<ul style="list-style-type: none"> AEMO recommends adding the words “in Trading Interval t” at the end of this sub-clause, as Associated Loads can change on a Trading Day boundary, in which case AEMO would need to use the set of Associated Loads for the Trading Day of the Trading Interval.
4.26.2CB	<ul style="list-style-type: none"> AEMO notes that the practical effect of this clause is to reintroduce Consumption Deviation Applications for DSPs. As such, AEMO recommends reintroducing a clause akin to the current 4.26.2CE to oblige AEMO to procedure a WEM Procedure for the purposes of a request under new clause 4.26.2CB. AEMO also recommends amending clause 4.26.2CC to allow for AEMO to reject a request under clause 4.26.2CB. AEMO can provide recommended drafting, if required.
Glossary	<ul style="list-style-type: none"> AEMO notes that all WEM Procedure changes under Schedule 1 must be complete by 1 May 2026 (clause 1.70.2). As such, AEMO considers that the definition of Financial Penalty can be removed in Schedule 3 of the Amending Rules.
Schedule 4	
4.28.4D	<ul style="list-style-type: none"> AEMO understands EPWA’s intention is to delete clause 4.25.4CE under Schedule 3. While AEMO supports this decision, we note that this would necessitate the removal of this reference from clause 4.28.4D from 1 October 2027.
Appendix 5	<ul style="list-style-type: none"> AEMO notes that currently the Individual Reserve Capacity Requirement (IRCRC) for an Associated Load is only calculated in the Indicative Individual Reserve Capacity Requirement run. However, the proposed change in Schedule 4 of the Exposure Draft requires AEMO to calculate the IRCRC for an Associated Load during every IRCRC run. The IRCRC is required as an input to determine the CRC for a DSP. Given the specific timing of that determination, AEMO uses the IRCRC from the most recent month and therefore the calculation in the Indicative Individual Reserve Capacity Requirement should be retained to provide clarity and to avoid system and process changes.

Schedule 5	
8.6.1A and 8.6.1B	<ul style="list-style-type: none"> While AEMO supports the policy intent of these clauses, implementation will require changes to AEMO's systems. AEMO is exploring available options and will advise EPWA of potential implementation timing and cost when this work is complete.

Attachment 2: Editorial suggestions and typographical errors

Schedule 1	
Clause	Comment / suggestion
1.67.1	AEMO recommends updating "WEM Rules" to "ESM Rules".
1.67.2	AEMO recommends updating "Demand side Programme" to "Demand Side Programme".
1.67.3	AEMO recommends updating "Post-Amending Rules" to "Post-Amended Rules", consistent with the definition in clause 1.67.1.
1.63.10	AEMO suggests deleting the word "then" immediately before the words "in respect of the 2027".
1.63.10(f)	AEMO suggests adding the word "and" to the end of this sub-clause, consistent with the conventions under the ESM Rules. AEMO notes that this should be removed again in Schedule 4.
1.71.1	AEMO recommends updating "WEM Rules" to "ESM Rules".
1.71.2	AEMO recommends updating "Requirment" to "Requirement" and "Post-Amending Rules" to "Post-Amended Rules".
2.29.5AB	AEMO suggests replacing the word "was" with the word "is" immediately after the words "Market Participant who" in this clause.
2.29.5AB(a)(i)	AEMO recommends replacing the word "allocated" with the word "apportioned", consistent with clause 4.20.16B.
2.29.5AB(a)(ii)	AEMO recommends adding the words "in accordance with clause 2.29.5B, apply to" at the beginning of this sub-clause. Further, AEMO recommends replacing the word "allocated" with the word "apportioned", consistent with clause 4.20.16B.
2.29.5AB(a)(ii)(2) and 2.29.5AB(b)(ii)	The defined term "Injection" relates only to Registered Facilities. As an Associated Load or Non-Dispatchable Load is not a Registered Facility, an alternative term should be used in these sub-clauses, or the definition of Injection amended.

	Further, AEMO suggests placing a comma after the words “for the Associated Loads” in these sub-clauses.
2.29.5AC(b)	AEMO recommends replacing the word “may” with the word “must” under this obligation, consistent with the intention of the clause. Further, AEMO considers it may also be beneficial for the words “Subject to clause 2.29.5AD” to be included at the commencement of the clause.
2.29.5AM(b) and 2.29.5AN(b)	AEMO is unclear on the identity of the abbreviation SCCL in these sub-clauses. AEMO also notes that the intent of the abbreviation SCCL is identical to the abbreviation CCTICL in sub-clause 4.26.1AC(b). Consistent with AEMO’s comments on clause 4.26.1AC(b) below, AEMO recommends the amending these references to TotalAssocLoads(f).
2.29.5B(f) and 2.29.5HA	Consistent with AEMO’s submission to the DER Exposure Draft, the term ‘non-contestable’ customer is used throughout the DER and Tranche 9 Amending Rules. It is not defined in the glossary, but rather states “as defined in the Metering Code” in each instance it is used. This method is inconsistent with how other terms are defined in the ESM Rules and creates the potential for mis-reading the subject that is specified to be defined in the Metering Code (e.g. in some instances, it could be mis-read to apply to other terms in the clause). Given the contents of the Metering Code will form part of the ESM Rules in time, AEMO recommends defining Non-Contestable Customer in the glossary and removing references to the Metering Code within the relevant clauses.
2.29.5E(f)(ii)(2)	AEMO suggests removing the word “or” from the end of this sub-clause as it does not align with the conventions of the ESM Rules.
2.33.1(b)	AEMO suggests including the words “notification of” at the commencement of this sub-clause.
3.11A.2(a)	AEMO suggests replacing the words “because of” with “due to” in this sub-clause. Further, AEMO suggests removing the comma after the word “level” in this sub-clause.
3.11A.2(b)	AEMO suggests adding the words “number of” after the word “actual” in this sub-clause to improve clarity.
3.11A.2(d)	AEMO recommends adding the words “has been identified” after the words “non-network solution” in this sub-clause to correct a typographical error. Further, AEMO recommends inserting a comma after the words “planning cycle” in this sub-clause.
3.18G.2	AEMO recommends adding the word “the” before the words “Economic Regulation Authority” in this sub-clause, consistent with other references in the ESM Rules.
3.18G.2(c)	AEMO notes that there is a superfluous space after the word “Proposals” in this sub-clause.

4.4A.8	AEMO suggests adding the word “the” before the words “date that the Reserve” in this sub-clause to correct a typographical error.
4.11.4A	AEMO suggests replacing the words “is assigning” with “assigns” in this sub-clause.
4.13A.5A and 4.13A.5A(a)	To improve clarity, AEMO suggests including the word “and” after the words “clause 4.10.1B” of clause 4.13A.5A. Following, the word “that” should be removed from the beginning of sub-clause 4.13A.5A(a). Further, AEMO recommends adding the word “that” after the words “Demand Side Programmes” in the final paragraph of the clause.
4.13A.5B(b)	To improve clarity, AEMO recommends replacing the words “draw down on” with the words “draw upon the” in this sub-clause.
4.13A.5B(e) 4.13A.5B(f)	AEMO recommends updating “allocated” to “apportioned” consistent with clause 4.20.16B. AEMO notes that this change would also apply to drafting in Schedule 3 of the Addendum.
4.13A.15A(b)	The sub-clause references clause “2.29.5AF” twice. AEMO recommends updating the second instance to “2.29.5AN”. AEMO notes that this error has been fixed in Schedule 3 of the Addendum, but not in Schedule 1.
4.13A.16	AEMO recommends the following drafting to simplify and improve clarity: “The payment obligations under clauses 4.13A.15 or 4.13A.15A may be satisfied by AEMO drawing upon the DSP Reserve Capacity Security for the relevant registered Demand Side Programme, or the single DSP Reserve Capacity Security that AEMO holds under clause 4.13A.5A in accordance with clause 4.13A.5B.” Please note, that AEMO has recommended subsequent changes to this clause for Schedule 3 in the above table above, for application from 1 October 2026.
4.13A.16B	To improve clarity, AEMO recommends replacing the words “draw down” with the words “draw upon” in both instances in this sub-clause. Further, to improve clarity and consistency, AEMO recommends replacing the word “allocated” to “apportioned” in this clause. Finally, AEMO recommends updating “apportioned to that DSP” to “apportioned to that Demand Side Programme” in this clause.
7.4.52	To improve clarity, AEMO suggests replacing the words “provide energy” with “Inject or Withdraw”, in this clause.

8.2.1 and 1.4.1(i)	While AEMO agrees with the change in terminology used in this clause, we recommend amending clause 1.4.1(i) to include sections (in addition to clauses).
Schedule 3	
2.29.5AG	AEMO recommends removing the comma after the word “may” and adding a full stop to the end of this clause.
2.29.5AH	AEMO recommends a full stop be inserted after the clause, consistent with conventions in the ESM Rules.
2.29.5AH(b)(ii)	AEMO recommends updating “Business day” to “Business Day” and “Participant” to “Market Participant”, and replacing the full stop at the end of the sub-clause that was removed in the Addendum.
4.13A.5A and 4.13A.5A(a)	Please note AEMO’s comments in Schedule 1 regarding these clauses, which also apply to this schedule.
4.13A.15	The defined term “Injection” relates only to Registered Facilities. As an Associated Load is not a Registered Facility, an alternative term should be used in this clause, or the definition of Injection amended. Further AEMO recommends updating “allocated” to “apportioned”, consistent with clause 4.20.16B.
4.13A.16A.	Including reference to clause 4.25.4CD in clause 4.13A.16 would necessitate updating clause 4.13A.16A to: “4.13A.16A. AEMO must pay the amount claimed under clauses 4.13A.15, 4.13A.15A, 4.13A.16 or 4.25.4CD, as compensation, to Market Participants in proportion to their IRCRs during the relevant Trading Day in accordance with Chapter 9.”
4.25.4	This clause starts with “If a Separately Certified Component of a Facility fails a Reserve Capacity Test requested by AEMO” which informs the context of the clause. Therefore, AEMO considers that subsequent references should be to “the Separately Certified Component”, rather than “that Separately Certified Component of the Facility”.
4.25.4CC(b)	AEMO suggests using “TDCY” in this sub-clause and prior calculation as the acronym reflects the number of Trading Days in the Capacity Year.
4.25.4CC(d)	AEMO recommends deleting the words “by AEMO” in this sub-clause as the Peak Capacity Credits references are assigned by the Market Participant under clause 2.29.5AB(a)(i).
4.25.9(b)	AEMO recommends removing the word “it” after the words “fuel that” to correct the typographical error in this sub-clause.
4.26.1	AEMO recommends removing the full stop at the end of this parent clause and replacing with a colon, consistent with the conventions of the ESM Rules.

4.26.1(a) 4.26.1(b) 4.26.1(c) 4.26.1(d) 4.26.1(e) 4.26.1(f)	AEMO recommends removing the capitalisation from the commencement of these sub-clauses, consistent with the conventions of the ESM Rules.
4.26.1(a)(iii) and 4.26.1(b)(v)(3)	AEMO recommends removing the full stop at the end of these sub-clauses and replacing with a semi-colon, consistent with the conventions of the ESM Rules.
4.26.1(b)(v)(2)	AEMO recommends removing the comma after “Trading Day” and updating “DSP” to “Demand Side Programme” to align with the defined term.
4.26.1A(a)(ii)(5)(ii)	The term Peak DSP Association Shortfall does not appear to be defined in the ESM Rules companion version for 1 October 2026.
4.26.1AA	To correct typographical errors and align with the relevant defined terms, AEMO recommends: <ul style="list-style-type: none"> • replacing the words “Trading Day Interval” with the words “Trading Interval”; • adding the word “DSP” before the words “Dispatch Event”; and • capitalising the word “interval” after the words “excluding the first Trading”. Further, to improve clarity, AEMO recommends replacing the term “minimum” with “lesser”.
4.26.1AA(b)	AEMO recommends adding the words “for the Demand Side Programme” before the words “for DSP Dispatch Event e” to improve clarity.
4.26.1AC(b)	AEMO is unclear on the identity of the abbreviation CCTCICL in this sub-clause. Consistent with AEMO’s feedback on clauses 2.29.5AM(b) and 2.29.5AN(b) above, AEMO and recommends amending this abbreviation to TotalAssocLoads(f,t).
4.26.1AF	AEMO notes the definition of DSP Dispatch Event includes both a test and dispatch. Therefore, AEMO recommends removing the term “Reserve Capacity Test” from this clause.
4.26.1AF(a)	AEMO recommends replacing the word “every” with the word “each” in this sub-clause to improve clarity.
4.26.2CA	AEMO notes that this clause refers to clause 2.29.5AJ, which has been removed in the Addendum.
4.26.2CB(b)	AEMO recommends replacing the colon with a full stop at the end of the sub-clause.
4.26.2CC(a)(i)	AEMO recommends changing “1” to “one”, consistent with conventions of ESM Rules.

4.26.2CC(a)(ii)	AEMO recommends adding “or” after the semicolon in this sub-clause.
4.26.2CC(a)(iii)	This sub-clause has been misnumbered to be (ii). AEMO recommends renumbering the sub-clause to (iii). AEMO also recommends deleting “a” before “AEMO”.
4.26.2CC(a)(iii)(2)	AEMO recommends adding “and” after the semicolon in this sub-clause.
4.26.2D(a)	<p>AEMO recommends replacing the sub-clause with the more concise words “if Demand Side Programme f was subject to a DSP Dispatch Event in Trading Interval t”, noting that the definition of DSP Dispatch Event includes both a Reserve Capacity Test and dispatch.</p> <p>Further, AEMO recommends replacing the word “restrict” with “amend” in subclause 4.26.2D(a)(ii) to be consistent with the terminology used in clause 7.13.5.</p>
Glossary	Peak DSP Event Shortfall: AEMO considers that the appropriate clause reference is “4.26.1AF”.
Schedule 4	
1.63.10(e)(ixA)	A definition of Flexible Reserve Capacity Deficit Refund does not appear to be defined in the companion version of the ESM Rules for 1 October 2027. AEMO queries whether this reference was intended to be Facility Reserve Capacity Deficit Refund.
1.63.10(f)	AEMO notes that the “and” recommended for inclusion as part of this submission under Schedule 1 should be removed under this Schedule 4 as additional clauses are added to the clause.
4.13A.15A	AEMO recommends updating “clauses 2.25.5AE, 2.29.5AF or 2.29.5AM” to “clauses 2.29.5AE, 2.29.5AF, 2.29.5AM or 2.29.5AN”
4.13A.15A(a) and 4.13A.15A(b)	AEMO recommends removing the capitalisation from these sub-clauses in Schedule 4, consistent with the convention of the ESM Rules.
4.13A.15A(a)(ii)	AEMO recommends changing the comma at the end of sub-clause 4.13A.15A(a)(ii) to “; and”.
4.28.4D	AEMO notes that Schedule 3 of the Addendum amends this clause, with those amendments not being reflected in Schedule 4, meaning that the deleted content under Schedule 3 would be reinstated under Schedule 4.
4.28.13	AEMO recommends replacing the words “TDL_Ratio” with the words “Total Ratio”, in this clause.
Appendix 5	AEMO recommends removing the words “as input” from the new Amending Rules under the second explanatory notes box.

Appendix 10	The definition of DSP Dispatch Event has been moved to the glossary under Schedule 3. Therefore, AEMO recommends removing the definition from Appendix 10 in Schedule 4.
Schedule 5	
8.4.3	<p>To improve clarity, AEMO recommends the following changes to this clause:</p> <ul style="list-style-type: none"> replacing the word “submitted” with the words “provided to AEMO”; deleting the word “the” before the words “Settlement Adjustment Date 2”; and adding the word “each” before the words “Market Participants”.
8.6.1(c)(iii)(1)	<p>To correct typographical errors, AEMO recommends:</p> <ul style="list-style-type: none"> deleting the duplicated word “with” in this sub-clause; and deleting the words “resolution of” and replacing with the word “a”.
8.6.1B	<p>AEMO recommends replacing the word “as” with the word “from” after the words “meter data” in this clause.</p> <p>Further, AEMO recommends adding the word “a” before the words “Notice of Meter Data Disagreement” in this clause.</p>
9.3.1(aA)	AEMO suggests adding the word “the” after the words “being 5:00 PM on” in this sub-clause to correct a typographical error.
9.15.2A	AEMO recommends deleting the comma at the end of the clause reference “9.15.1(a)(i)” to improve clarity.
9.16A.1	As meter data is not provided under clause 8.4.3, AEMO recommends replacing the words “provided under clause 8.4.3” of this clause with the words “meter data reflected in a Settlement Statement or for which the Rule Participant is notified under clause 8.4.3”.