



19 November 2025

Energy Policy WA
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PERTH WA 6000

By email: energymarkets@deed.wa.gov.au

Tranche 9: Exposure Draft - Proposed Electricity System and Market (ESM) Amending Rules

Alinta Energy appreciates the opportunity to provide feedback on the Tranche 9 ESM Amending Rules Exposure Draft.

In response to the proposals, we provide the following comment:

- Alinta Energy supports the proposed changes to the ESM Rules to introduce a new framework that will prevent a situation in which meter data is used in the final settlement adjustment without the opportunity for a Market Participant to disagree with the meter data.

The proposed new framework will address the identified gap in the existing framework that allows incorrect meter data to be re-submitted after the Settlement Disagreement Deadline and used in final settlement adjustments without an opportunity for effected Market Participants to challenge it. Closing this gap will strengthen market integrity and prevent issues from arising in the future.

Given the importance of this change and the absence of an intended commencement date, we request that implementation be scheduled for early 2026. While we appreciate the work required by Western Power and AEMO to operationalise this change we propose that the relevant Amending Rules should be affected as part of:

- Schedule 1 on 1 January 2026; or
 - Schedule 1A on 1 March 2026.
- Alinta Energy supports the proposal to bring forward the policy decision from the RCM Review to remove the concept of Non-Temperature Dependent Loads (NTDLs) by making the NTDL ratio equal to the Temperature Dependent Loads (TDLs) ratio. We support the proposed amendments scheduled to commence 1 March 2026 as it will mitigate the current situation where NTDLs are paying more for reserve capacity than TDLs.

Thank you for considering our submission. If you would like to discuss our submission further, please contact me at Jean.Mileto@alintaenergy.com.au.

Yours sincerely,

Jean Mileto
Regulation and Compliance Specialist