

18 November 2025

Ms Dora Guzeleva
Director, Wholesale Markets
Energy Policy WA
Lodged by email to energymarkets@deed.wa.gov.au

Dear Ms Guzeleva

Tranche 9 Exposure Draft and Addendum of ESM Rules

Change Energy appreciates the opportunity to comment on the Tranche 9 Exposure Draft and Addendum of the ESM Rules. We consider each of the proposed changes outlined below will be beneficial to the market and should deliver improved market outcomes overall and help reduce costs to customers.

8.6 Format of Meter Data Submissions

Change Energy fully supports the changes introduced in Clause 8.6 for the reasons set out in the MAC 2025_10_16 Papers and subsequent discussions at the MAC meeting on 16 October 2025.

Meter data provides the foundation for the entire market. All participants, especially customers need to be assured that meter data is accurate and provided in a timely manner.

Appendix 5: Peak Individual Reserve Capacity – remove zero floor applied to metered energy

Change Energy supports the proposed changes to Clause 10 in Appendix 5. Allowing a negative energy value for an interval meter will incentivise end users to support the grid in times of stress. Additionally, this may result in Western Power calling for less NCESS services in localised areas. Finally, this change will mean consistent treatment between interval meters and the notional meter.

Appendix 5: Individual Reserve Capacity – removal of NTDL

Change Energy supports the bringing forward of the previous policy decision to remove the concept of NTDL from the Rules. Change Energy considers the administrative cost of bringing the change forward to 1 March 2026 to be immaterial when compared to the overall costs to administer the WEM. Additionally, having this change in place in time for the October 2026 Capacity Year will provide a small benefit to most customers that are already experiencing an almost 100% increases to the electricity costs.

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

[REDACTED]
Geoff Gaston

CEO
