

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

19 November 2025

Via email: energymarkets@demirs.wa.gov.au

Submission in response to Consultation Paper: Exposure Draft of Electricity System and Market Amending Rules (Tranche 9)

Thank you for the opportunity to make a submission in response to the exposure draft of the Tranche 9 rules.

The Expert Consumer Panel (ECP) represents small use customers on the Market Advisory Committee (MAC) which has had input on these rules. An ECP member also attended the Transformation Design and Operation Working Group (TDOWG) meeting on 12 November where specific issues arising out of the rules were discussed.

As representatives of household and small business consumers, we are strongly in support of the proposed change to strengthen the adjustment and dispute resolution process for meter data anomalies. The efficient and effective functioning of the wholesale market, and consumer trust and confidence in billing, is underpinned by integrity of meter data.

While we appreciate that the issue identified by Change Energy (and impacting others) is linked to a major change in the settlement process (i.e., transition from 30 min to 5 min settlement), the ongoing evolution and complexity of the market means that it is possible that other metering anomalies will arise in the future. It is critical therefore that the rules framework provides Western Power and market participants with the ability to identify and correct errors in an efficient and orderly way.

The proposals to adjust the current rules, to introduce a new deadline for Western Power to adjust meter data, notify customers of any adjustments made after the relevant settlement adjustment data to ensure disputes have been actioned, and for parties to be able to engage directly with Western Power about meter data disagreements, are sensible, and should not be burdensome for Western Power.

Please do not hesitate to contact ECP member Chris Alexander at chrisgalexander163@gmail.com if you would like to discuss this submission further.

Yours sincerely,

Expert Consumer Panel