



12 November 2025

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

Lodged email: [energymarkets@dmirs.wa.gov.au](mailto:energymarkets@dmirs.wa.gov.au)

Dear EPWA,

## RE: Amending Rules Tranche 9 Exposure Draft Addendum

Shell Energy Australia Pty Ltd (Shell Energy) welcomes the opportunity to provide feedback to Energy Policy WA (EPWA) on the Exposure Draft for the Tranche 9 Amending Rules Addendum (the Addendum) which includes two key changes in addition to the Exposure Draft of the Tranche 9 Amending Rules. We understand that EPWA will consider feedback from this consultation and provide a report to the Minister for Energy.

### About Shell Energy in Australia

Shell Energy is Shell's renewables and energy solutions business in Australia, helping its customers to decarbonise and reduce their environmental footprint.

Shell Energy delivers business energy solutions and innovation across a portfolio of electricity, gas, environmental products and energy productivity for commercial and industrial customers, while our residential energy retailing business Powershop, acquired in 2022, serves households and small business customers in Australia.

As the second largest electricity provider to commercial and industrial businesses in Australia<sup>1</sup>, Shell Energy offers integrated solutions and market-leading<sup>2</sup> customer satisfaction, built on industry expertise and personalised relationships. The company's generation assets include 662 megawatts of gas-fired peaking power stations in Western Australia and Queensland, supporting the transition to renewables, and the 120 megawatt Gangarri solar energy development in Queensland.

Shell Energy Australia Pty Ltd and its subsidiaries trade as Shell Energy, while Powershop Australia Pty Ltd trades as Powershop. Further information about Shell Energy and our operations can be found on our website [here](#).

### NTDL and TDL ratios

Shell Energy understands that the Addendum proposes an amendment to bring forward the policy decision from the Reserve Capacity Mechanism (RCM) Review to remove the concept of Non Temperature Depend Loads (NTDLs) by making the NTDL Ratio equal to the Temperature Dependent Load (TDL) Ratio. This is outlined in

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<sup>1</sup>By load, based on Shell Energy analysis of publicly available data.

<sup>2</sup> Utility Market Intelligence (UMI) survey of large commercial and industrial electricity customers of major electricity retailers, including ERM Power (now known as Shell Energy) by independent research company NTF Group in 2011-2021.

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Appendix 5 of the Exposure Draft and is proposed to bring forward the commencement to March 2026, however, the rules that achieve the same policy intent have already been scheduled to commence on 1 October 2027.

Shell Energy questions the need for this amendment to be brought forward when the ratios are currently very similar, and the proposal for NTDL and TDL to be equal means there is limited impact relative to the costs incurred by Market Participants (MPs) for fast tracking a rule change, and considering these changes are being packaged together with several other schedules of RCM amendments that require implementation in 2027. Waiting until the planned implementation date of 1 October 2027 avoids additional costs associated with early unscheduled system and process changes, and we are concerned that accelerating policy reform would impose further unnecessary financial burden on Market Participants.

Whilst we acknowledge that customers may have concerns regarding the NTDL ratio shift from 1.1 to 1.25 between September and October 2025, our understanding is that the changes discussed in the Transformation Design and Operation Working Group (the TDOWG) outline that the amendments to bring forward do not revert the NTDL ratios to previous levels, rather they simply align the NTDL and TDL ratios.

Based on the above considerations, Shell Energy finds it difficult to justify accelerating this change ahead of the already scheduled implementation date.

## Conclusion

We welcome the opportunity to discuss our submission further. Please contact Tessa Liddelow at [tessa.liddelow@shellenergy.com.au](mailto:tessa.liddelow@shellenergy.com.au) for any queries regarding this submission.

Yours sincerely

Libby Hawker

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