



18 November 2025

Wholesale Electricity Markets
Energy Policy WA – DEED
66 St Georges Tce
Perth WA 6000

Dear Wholesale Electricity Markets team

Simcoa thanks Energy Policy WA for the opportunity to provide feedback on the Exposure Draft of Electricity System and Market (ESM) Amending Rules (Tranche 9) and the subsequent amendments.

We offer the following comments for your consideration;

Tranche 9 Addendum

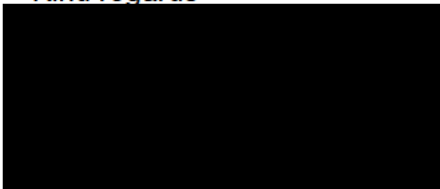
1. Demand Side Programmes

The Addendum proposes to allow Market Participants to nominate up to 20 days in a Capacity Year for exclusion from the calculation of the dynamic baseline, subject to notifying AEMO no later than one Business Day after the day to be excluded. We agree this approach is a constructive step toward resolving the issue. However, we consider the one-day notification period to be somewhat restrictive. While we understand the intent to minimise administrative burden on AEMO, particularly where numerous NDLS are involved, we recommend extending the notification period to three Business Days. This would provide Market Participants with a more practical timeframe to manage such requests.

2. Non-Temperature Dependent Load (NTDL)

The Addendum proposes to bring forward the policy decision from the Reserve Capacity Mechanism Review to remove the concept of a Non-Temperature Dependent Load (NTDL) so as to remove the current situation where the NTDL ratio is higher than the TDL ratio. Whilst this would provide some short-term benefit to NTDL loads, it may not do so over the whole period prior to 1 October 2027. In this instance therefore, we suggest that the proposed changes are not brought forward. We do acknowledge the consideration that has been given to the current issue.

Kind regards



Graeme Ross
Energy Specialist