

Market Advisory Committee (MAC) - Minutes

Date:	20 November 2025
Time:	1:30pm – 3:30pm
Location:	Microsoft Teams online/ In person

Attendees	Representing in MAC	Comment
Sally McMahon	Chair	
Amy Tait	Australian Energy Market Operator (AEMO)	
Katie McKenzie	AEMO	
Rhiannon Bedola	Synergy	
Matthew Veryard	Network Operator	
Luke Skinner	Small-Use Consumer Representative	
Geoff Gaston	Energy Retailer	
Tim Edwards	Energy Retailers	
Patrick Peake	Energy Retailer	
Paul Arias	Energy Producers	
Jacinda Papps	Energy Producers	
Adam Stephen	Energy Producers	
Graeme Ross	Contestable Customer	
Rajat Sarawat	Observer (ERA)	
Other attendees	From	Comment
Kirsten Rose	AEMO	Invited to address the MAC (left 1:50pm)
Aaron Bowling	Western Power	Presenter for Item 5
Lipakshi Dhar	ERA	Presenter for Item 6
Dora Guzeleva	Observer appointed by the Minister	Proxy for Noel Ryan
Laura Koziol	Energy Policy WA (EPWA)	MAC Secretariat
Shelley Worthington	EPWA	MAC Secretariat
Luke Commins	EPWA	MAC Secretariat
Apologies	From	Comment
Noel Schubert	Small-Use Consumer Representative	
Peter Huxtable	Contestable Customer	
Noel Ryan	Observer appointed by the Minister	



1. WELCOME

The Chair opened the meeting with an Acknowledgement of Country.

The Chair noted that she had no conflicts to declare.

The Chair noted the Competition and Consumer Law obligations of the MAC members, inviting members to bring to her attention any issues should they arise.

2. MEETING APOLOGIES AND ATTENDANCE

The Chair noted the attendance as listed above.

Introduction - AEMO Executive General Manager Western Australia (WA) Kirsten Rose

Ms Rose introduced herself and provided a brief overview of her background and prior experience. She noted that during her first three months at AEMO her focus had been on:

- intensive stakeholder engagement - to identify what stakeholders think AEMO is doing well and what AEMO could be doing better; and
- working closely with AEMO's teams and external stakeholders to get a clear understanding of the broader energy sector in Australia.

Ms Rose noted the following outcomes from those engagements:

- AEMO's technical knowledge and expertise in WA is held in high regard, however, stakeholders perceived that it was sometimes slow, risk averse or opaque on some of its decisions.
- stakeholder acknowledged that AEMO's transparency and engagement in WA was improving including through initiatives like the Strategic Energy Forum and the Major Projects Working Group;
- the energy sector was struggling with the pace of change.

Ms Rose noted that, in response to the feedback, her focus was for AEMO to continue to increase visibility and transparency not only of what AEMO is doing but also on how things are done and why specific decisions are made.

Ms Rose thanked stakeholders for their input in AEMO's work such as the:

- WA Gas Statement of Opportunities to be published in December; and
- 2026 WA Electricity Statement of Opportunities for which work would start early next year.

4. ACTION ITEMS

The Chair noted that Western Power would speak to the open action item under agenda item 5.

5. METER DATA ANOMOLIES

Mr Bowling, Western Power's meter data manager, provided a summary of the issue, the underlying cause of the issue and Western Powers actions to rectify it.

- Mrs Papps asked why Western Power was implementing 5-minute meter readings so far ahead of the implementation timeline for 5-minute settlement.

Mr Bowling replied that previously it had been planned to implement 5-minute settlement by 1 October 2025. To achieve this timeline, Western Power had to commence its work

program ahead of time. While the implementation date for 5-minute settlement had since been extended, Western Power had now nearly completed its work program for the implementation.

- Mrs Papps considered that Western Power's Service Standards report appeared to be quite light on meter data quality and accuracy. She asked if the ERA was contemplating addressing meter data accuracy in future access arrangements, noting the role of good quality meter data has in a well-functioning market.
- Mr Gaston supported the increase of meter data quality assessment in the ERA Access Arrangements.
- Mr Sarawat noted that he would come back to the MAC with a response to Mrs Papps' query.

Action Item: ERA to advise the MAC about whether it is considering including assessment of meter data quality and accuracy in future Western Power Access Arrangements.

- Mr Veryard advised the MAC that the ERA would soon publish an issues paper outlining what service standards should apply to Western Power.

In response to a question from Mr Gaston, Mr Bowling replied that the meter data anomalies affected meter data from July 2024 to when Western Power made the system change a few months ago. He noted that he could come back to Mr Gaston with the exact date.

- Mr Gaston asked how affected Market Participants would be kept whole for this period.

Mr Bowling advised that he was unable to provide a response to Mr Gaston at this time and noted that:

- AEMO had asked Western Power to prioritise in its review dates for which Settlement Adjustment 3 had not yet occurred;
- to date, most of the identified issues were for dates for which Settlement Adjustment 3 had not yet occurred; and
- Western Power would need to address any impact on a case-by-case basis.

Action item: Western Power to provide dates for the period during which meter data was affected by the anomalies to the MAC.

Ms Guzeleva noted that:

- EPWA has received mixed views from stakeholders about whether the implementation of 5-minute settlement should proceed;
- both AEMO and Western Power were currently assessing how 5-minute settlement could be implemented and what this would cost;
- further consultation would likely be required to before a final decision to proceed; and
- 5-minute metering data is a great asset for the WEM even if it is not used for 5-minute settlement, with the data being extremely important for network management as well as useful for AEMO.

6. UPDATE ON BENCHMARK RESERVE CAPACITY PRICE (BRCP) PROCESS

Ms Dhar presented the slides for agenda item 6 and noted that the ERA was seeking feedback from the MAC on its Procedure Change Proposal for the BRCP WEM Procedure.

- Mr Peake noted that GHD's report stated that BESS typically restricts discharge to 80% of its maximum capacity but that the Procedure Change Proposal proposed to oversize BESS by only 10%.
- Mr Edwards agreed with Mr Peake that the BESS should be sized so it could actually inject 1200MWh.

Ms Dhar noted that, as BESS technologies are improving, the level of oversizing will change. Therefore, the proposal is for the WEM Procedure to provide for oversizing sufficient for the BESS to be able to meet capacity obligations, but not to specify the exact level. She noted that the oversizing will be reviewed every year as part of determining the BRCP.

- Mr Peake considered that the needed oversizing would likely impact the required land size which is specified in the WEM Procedure.
- Mrs Papps asked how the costs for community benefit programs were being accounted for in the BRCP determination. She noted that, while the Community Benefits Guideline does not currently attribute a dollar value to BESS, there was a cost that had to be recovered.
- Mr Sarawat responded that the WEM Procedure and the actual determination of the BRCP were two different pieces of work. He noted that the ERA will see if it needed to make it clearer if such payments fall under fixed capital costs, or fixed operational and maintenance cost, or whether this requires further consideration.
- Mr Edwards considered that the Construction Training Fund Levy should also be considered. He noted that the related payment for a 200MW / 1200 MWh BESS was significant.
- Ms Tait asked how the ERA is expecting the change in location to affect the BRCP, given that this part of the network is yet to be built.

Ms Dhar responded that she could not provide further comment as the ERA was awaiting advice from Landgate. She advised that the costs will be included in the ERA's draft determination of the BRCP to be published in January 2026.

Ms Dhar advised that the consultation would close on 11 December 2025 and that an additional industry forum will be held on 2 December 2025. She noted that the Procedure Change Report must include a summary of views expressed by the MAC and asked for any additional views.

- Mr Skinner provided his support for keeping the annuity tilt at one.
- Mr Peake noted that the Procedure Change Proposal was a comprehensive report that was easy to read.

The Chair summarised that the MAC advised the ERA that assumptions about the reasonable size of a BESS in the BRCP must account for appropriate oversizing of a BESS to allow injection capability to match the assumed Capacity Credits considering minimum discharge levels of BESS.

7. UPDATE ON WORKING GROUPS

(a) AEMO Procedure Change Working Group

Ms Guzeleva apologized that the paper circulated in the pack was last MAC meeting's paper and not the new paper provided by AEMO for this meeting. She noted that the correct paper would be circulated to the MAC and the meeting papers republished.

Ms Tait advised that the Certified Reserve Capacity (CRC) and the Declaration of Bilateral Trades WEM Procedures were open for consultation and the consultation on the Network Access Quantity (NAQ) Model WEM Procedure had closed last week.

Ms Tait noted that AEMO was expecting to publish two additional WEM Procedures shortly and four WEM Procedures would be presented at the next APCWG meeting.

(b) AEMO's Major Projects Working Group (MPWG)

Ms Tait noted that no meetings have been held since the last MAC meeting. She informed members that AEMO updated the MPWG webpage with the final version of the four most recent implementation assessments and that the next meeting of the MPWG was scheduled for 1 December 2025.

(c) Power System Security and Reliability (PSSR) Standards Review Working Group

Ms Guzeleva noted that the consultation period for Proposal 20 from the PSSR Consultation Paper – Adopting Western Power's September 2023 Proposed Technical Rules Amendments had been closed, with several submissions received and currently under review. She also outlined the upcoming priorities for the project, which are to:

- defining the roles and responsibilities related to a system strength framework for the South West Interconnected System (SWIS);
- Western Power publishing a technical paper to consult on proposed amendments to the technical requirements (connection standards) for grid-forming and grid-following inverter-based resources.

Ms Guzeleva noted that she expected to provide a more fulsome update at the next MAC meeting scheduled for 12 February 2026.

(d) Essential System Services (ESS) Framework Review Working Group

Ms Guzeleva noted that an addendum to the Consultation Paper for the ESS Framework Review had been published for consultation. This addendum contains the proposed Electricity System and Market (ESM) Amending Rules to implement the proposal to increase the Rate of Change of Frequency (RoCoF) Safe Limit from 0.25 Hz per 0.5 second (0.5 Hz per 1 Second) to 0.75 Hz per second.

In response to a question from Mrs Bedola, Ms Guzeleva advised that she will confirm the commencement date with AEMO and advise the MAC accordingly.

- Mrs Papps sought clarification on whether the increase in the RoCoF Safe Limit would require all Facilities to seek re-accreditation, and if so, requested that AEMO provide information on what would be required for that assessment.

Ms Guzeleva advised that Facilities underwent accreditation for the purpose of cost allocation. Currently they were not attributed costs for RoCoF and, although this might change in the future, the costs for RoCoF were now only a fraction of what they used to be.

Ms Guzelva agreed to seek confirmation on whether Facilities would be required to demonstrate their capability to ride through the increased RoCoF Safe Limit.

- Ms Tait noted that she would work with Ms Guzeleva to confirm this.
- Mrs Bedola requested that sufficient notification be provided to allow Market Participants to be prepared ahead of the proposed increase.

Ms Guzeleva noted that AEMO and EPWA were aware that some Market Participants may have some difficulty in providing the documentation required to confirm their ride through ability. She noted that commencement and implementation had not yet been discussed, but that AEMO would likely require some time to implement the change.

Action Item:

- 1. EPWA to seek clarification from AEMO what is required from Facilities to demonstrate that they can ride through the increased RoCoF Safe Limit.**
- 2. EPWA to seek clarification of the commencement date for the increased RoCoF Safe Limit from AEMO and advise the MAC.**

(e) Capability Class 2 Technologies Review Working Group (CC2TRWG)

Ms Guzeleva outlined the main priorities for the CC2TRWG as drafted in the agenda paper and advised that the next working group meeting is on 4 December 2025.

8. RULE CHANGE PROPOSAL (RC_2025_01)

The Chair advised that the MAC was asked to note RC_2025_01 submitted by Bluewaters Power (Bluewaters) and provide feedback as part of the Standard Rule Change Process.

Ms Guzeleva advised that the discussion was important as the ESM Rules require the Coordinator of Energy (Coordinator) to consider the views of the MAC in making its decision on RC_2025_01.

- Mr Skinner raised concern that the proposed changes could potentially lead to very bad outcomes for consumers. He considered that:
 - large generators that have previously been assigned Capacity Credits could leave the Reserve Capacity Mechanism (RCM) for different reasons, such as failing certification, the Market Participant deciding to pull out of the process or intentionally failing that process;
 - if a Market Participant is then contracted for supplementary capacity (SC) it will potentially be paid significantly more with far less accountability and less requirements than it would have had under the RCM;
 - the proposal appeared to be aimed at coal-fired power plants, which are less reliable during the Hot Season (for which SC is procured); and
 - this poses increased cost to consumers and a risk to reliability, if a Facility could not meet its Reserve Capacity obligations. This risk was even more critical during the period for which SC is required.
- Mr Arias considered, that if AEMO identified a capacity shortfall, any provision of additional capacity should be considered. He suggested that, to address gaming opportunities, price caps could be applied when procuring SC from Facilities that used to hold Capacity Credits in previous years.

Ms Guzelva clarified that RC_2025_01 pertained to Facilities that have applied for CRC but were not certified by AEMO which was different from self-withdrawal from the market.

- Mr Stephen, expressed his support for RC_2025_01 considering that conditions could change between a Facility failing to be certified and when the need arises for SC.
- Ms Tait noted that:
 - AEMO is in favour of any change that might free up capacity;
 - RC_2025_01 would have to apply to all Market Participants equally;
 - there are many reasons why a Facility may not be certified or have its CRC reduced, such as NAQs or fuel constraints; and
 - AEMO was currently assessing the potential consequences of RC_2025_01.
- Mrs Bedola noted that she was concerned about potential gaming of the RCM but also about paying for unreliable capacity. She considered that clarity would need to be provided on how a Facility that failed to meet the criteria for CRC would then be eligible for SC and noted that there would need to be very clear barriers and guidelines around this to eliminate gaming opportunities.
- Mr Gaston expressed concern about gaming opportunities and suggested that if a Facility applied for CRC but failed and was then deemed eligible for SC some form of price cap should apply, either at the Capacity Credits that they had applied for or the transitional price rate. He noted that he was supportive of making more capacity available to increase competition in the SC process.

The Chair summarised that:

- MAC members had noted that, if RC_2025_01 resulted in more capacity available at a lower cost to consumers, this may have merit, but that there was also concern with the potential for gaming and generators receiving a much higher price for SC;
- there was a need to understand why a Facility failed to be certified and the extent those reasons impacted on their capability to provide SC; and
- RC_2025_01 should result in consumers receiving a better outcome in terms of price and reliability.

In response to a question from Mrs Bedola, Ms Guzeleva clarified that a NAQ constraint is only applicable to the extent that affects availability during peak demand. She advised that AEMO would not reduce the NAQ to zero for a Facility that is only partially constrained.

- Mr Ross noted the importance of considering RC_2025_01 beyond coal fired facilities as the change might bring opportunities for other potential providers, such as those of Demand Side Programmes (DSP).

Ms Guzeleva noted that the recent regular SC processes had already have a perverse unintended consequence for DSPs. She noted that concerns have been raised that the higher prices and less obligations for SC have, over the past four years of SC procurement, created an environment in which loads hold out for SC instead of signing up for Capacity Credits through a DSP.

The Chair noted that RC_2025_01 should be considered beyond Bluewaters circumstances and considered for its impact on all capacity providers, including DSPs.

- Mr Ross noted that Ms Guzeleva's comment highlighted that RC_2025_01 may not play out as intended and needs to be considered by members.

The Chair asked MAC members who had not already spoken to provide any comments.

- Ms Papps advised that Alinta Energy was still conducting an internal review on RC_2025_01 and had no comment at this stage.

Mr Edwards noted that Market Participant should not be allowed to use the proposed new provisions to avoid receiving the Transitional Reserve Capacity Price for a Facility.

9. MAC CONSTITUTION REVIEW

Ms Guzeleva noted that the changes to the ESM Rules to implement the outcomes of the MAC review had undergone several rounds of consultation and that the MAC Constitution must be consistent with the ESM Rules. She noted that the MAC was asked to provide comment on provisions that are proposed to be deleted such as the reference to a quorum.

- Mrs Papps sought clarification on how the MAC could meet its obligations under clause 2.3.1A of the ESM Rules to ensure that its advice was consistent with the SEO and how the MAC, as a group could balance all three limbs of the SEO. Mrs Papps suggested that the Chair may also be required to navigate this.

Ms Guzeleva noted that the change in the MAC Constitution was to change the reference from the 'Wholesale Electricity Objective' to the 'SEO'.

The Chair considered it was incumbent on the MAC to consider all three limbs of the SEO. Balancing competing objectives was an ongoing learning and development process and ultimately, MAC members need to use their own judgement and ensure there is transparency around the advice provided.

- Noting that not all MAC members were technical experts, Mrs Papps sought clarification on how the MAC was expected to provide advice once the Technical Rules moved to the ESM Rules and whether it was intended to form a sub-committee to provide technical expertise.

Ms Guzeleva replied that:

- a proposed outcome from the PSSR Standards Review was the need for a technical or reliability panel;
 - there was a risk that the more committees were established, the less work would be done; and
 - a similar group, comprised of technical and subject matter experts, could be established under the MAC and this was open for suggestions.
- Mrs Papps supported Ms Guzeleva's position.

The MAC supported a three-week consultation on the changes to the MAC Constitution.

10. 2026 MAC MEETING SCHEDULE

The Chair asked if the MAC accepted the 2026 meeting scheduled as proposed.

The MAC agreed to the meeting dates and to consider in person meetings for 2026, subject to other commitments.

It was noted that in the MAC schedule provided in the MAC papers, the 23 June 2026 meeting date was incorrect, and the schedule would be recirculated.

11. WEM EFFECTIVE REVIEW – PROGRESS UPDATE

The paper was taken as read.

12. MARKET DEVELOPMENT FORWARD WORK PROGRAM

The paper was taken as read.

Ms Guzeleva advised that the WEM Investment Certainty Review Working Group would reconvene pending details on the Tim Nelson Review in the National Electricity Market.

- Mr Skinner provided his support for this.

13. OVERVIEW OF RULE CHANGE PROPOSALS

The paper was taken as read.

14. GENERAL BUSINESS

Mr Edwards raised concern about changes to the Temperature Dependent Load (TDL) and Non-Temperature Dependent Load (NTDL) ratios on behalf of his customers. He noted that:

- historically, the Individual Reserve Capacity Requirement (IRCR) for NTDLs was lower than for TDL, on the basis that NTDLs are relatively flat with little variation between peak and off-peak periods.
- In this Capacity Year, NTDLs will pay more for Peak Reserve Capacity than TDLs, which consume more power during peak periods, and this appears to be a perverse outcome;
- Amending rules that are yet to commence will remove TDL/NTDL multipliers from the IRCR process, which would permanently remove the distinction between flat loads and loads that consume more during high demand days; and
- the Loads most affected by this change are also the ones approached to provide SC, invested in solar and behind the meter batteries, are able to move their production around and/or can curtail their consumption if required to reduce demand. These Loads are important to WA in terms of the jobs they create and products they export.

Ms Guzeleva explained that:

- the reason the NTDL has a higher ratio this year, while unexpected was due to the size of the Reserve Margin and a capacity shortfall;
- the data had been assessed for next year and this was not expected to occur again;
- a rule change to bring forward the changes to the ratios so they were equalised on 1 March 2026 (i.e. brought forward from 1 October 2027) was consulted on at the Transformation Design and Operation Working Group (TDOWG) meeting held on [12 November 2025](#); and
- the decision to remove the concept of NTDL from the ESM Rules, so that NTDLs and TDLs would have an equal ratio, was a policy outcome from the 2023 RCM Review and was extensively consulted on, including with the MAC.

Mr Edwards considered that:

- the policy outcomes and rule changes over the past six years have had a perverse outcome; and
- many industries went to a great effort to be certified as a NTDL this year and, if they had not done so they would be paying less.



Ms Guzeleva reiterated that extensive consultation had been undertaken, the ESM Rules to affect this were made in 2023 and that she could explain this further offline.

The Chair thanked Mr Edwards for raising his concern and asked him to discuss this matter with Ms Guzeleva offline to understand the drivers of this outcome and whether it was consistent with the intent of the rules.

The Chair thanked members for their contributions over the year, noted that the meeting scheduled for 18 December 2025 would be cancelled and the first meeting for the new year would be 12 February 2026.

The meeting closed at 3:30pm.