

10 December 2025

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

Dear Ms Guzeleva

Rule Change Proposal RC_2025_01 - Supplementary Reserve Capacity Amendments

Change Energy appreciates the opportunity to comment on the Rule Change Proposal RC_2025_01 - Supplementary Reserve Capacity (SRC) Amendments.

In general Change Energy supports increased competition in the electricity market that will reduce costs for customers. Recent NCESS and SRC tenders have resulted in extreme prices being paid to secure capacity for perceived shortfalls.

We believe that allowing generation capacity that has failed to be assigned capacity credits to participate in SRC may lower costs in the future. The main concern is the gaming of the certification process by a capacity provider to achieve a higher price for their facilities.

This gaming could be avoided by setting a price cap on the capacity providers submission. The Availability Price could be set at the lower of the Transitional Peak RCP and the Peak RCP. Further any Activation Payment could be limited to the capacity providers historical short-run marginal cost.

Additionally, AEMO could have the explicit power to not award SRC to previous capacity providers if it has reason to believe that it has been deliberately withheld from the Reserve Capacity Certification process to gain an advantage.

If you have any questions or would like to arrange a meeting to discuss any aspect of this submission, please contact me on 0401 903 210 or at Geoff.Gaston@changeenergy.com.au.

Yours Sincerely,

Geoff Gaston

CEO
