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Submission from the WA Expert Consumer Panel on the Essential System Services Framework Review: Consultation Paper and its Addendum - Exposure Draft of Electricity System and Market (ESM) Amending Rules

Thank you for the opportunity for members of the WA Expert Consumer Panel (ECP) [Anne Hill, Chris Alexander, Luke Skinner, Noel Schubert, Rosh Ireland] to make a submission on the above consultation paper and addendum.

As a panel supported by the State Government's Western Australian Advocacy for Consumers of Energy (WA ACE) program, we are committed to improving consumer outcomes in the energy sector. We represent energy consumers on the Market Advisory Committee (MAC) and its working groups including the Essential System Services Framework Review working group, and in other consultation processes relevant to consumers of energy in Western Australia.

Comments

ECP members support all of the proposals in the consultation paper, and the proposed changes shown in the Draft ESM Amending Rules addendum to the consultation paper to implement the proposed change to the RoCoF safe limit.^{1,2,3}

The focus of the Essential System Services Framework Review has been, and continues to be, on whether the ESS Standards and Requirements are consistent with the Western Australian (WA) State Electricity Objective (SEO). This includes determining whether the ESS requirements in the WEM are set at their most efficient level and whether the ESS quantities that are dispatched to meet those requirements are being efficiently and effectively procured and scheduled, while maintaining security and reliability of supply at the lowest cost to consumers.

Importantly, decisions should give appropriate consideration to all three limbs of the SEO - security/reliability, price, and environmental outcomes. Therefore, the ESS Standards and requirements should also ensure that the requirements, in addition to considering efficiency and cost, support the integration of renewable energy, demand side programs and other measures

¹ [Essential System Services Framework Review Consultation Paper](#), 10 November 2025

² [Addendum to the Essential System Services Framework Review - Consultation Paper](#); Exposure Draft of Electricity System and Market (ESM) Amending Rules

³ RoCoF – Rate of Change of Frequency

that result in good environmental outcomes - at an efficient cost without impacting on system security/reliability.

ECP members support the proposals outlined in the consultation paper, as they collectively aim to deliver meaningful improvements to system efficiency and performance. The associated benefits, including cost reductions and enhanced operational outcomes, are highly desirable and should be realised as soon as practicable. For this reason, ECP members strongly endorse the timely implementation of these measures.

Proposal 3 – Increase the RoCoF safe limit

Implementing the change to 0.75 Hz/second for the RoCoF safe limit is encouraged as soon as possible, as preliminary economic analysis suggests it could result in significant savings. It would bring the limit closer to that commonly applied in other jurisdictions – 1.0 Hz/second – and reduce the number of AEMO market interventions needed, which typically result in higher market costs than if they were not needed. Experience from other jurisdictions suggests that there are not likely to be material negative implications for generators from the change.

Given that a RoCoF safe limit of 1.0 Hz/second is widely adopted as the standard in the NEM and comparable international markets, we recommend that EPWA and AEMO urgently undertake a detailed assessment on whether the WEM can support an accelerated transition to this level. If the analysis confirms that this is technically feasible without material negative implications, then we urge that the RoCoF safe limit be adjusted accordingly without unnecessary delay, as this will help to further reduce market costs.

Proposal 4 – Quantifying how much MPFR response is available

The proposal is for AEMO to implement a monitoring program over a twelve-month period to track the amount of headroom and footroom available from unaccredited Facilities or non-dispatched FCESS Facilities to better quantify Mandatory Primary Frequency Response (MPFR) availability to assess the level of Contingency Reserve Raise and Lower that could be provided from the inclusion of MPFR.

Taking into account available MPFR response could reduce the quantities of Contingency Reserve Raise (CRR) and Lower (CRL) that need to be procured, and so lower the cost of these to the market.

ECP members support this monitoring initiative. However, we ask that if it becomes clear that significant and reliable quantities of headroom and footroom are available to offset procured CRR and/or CRL before the monitoring period concludes (after 6 to 9 months to account for seasonal variation), then we ask that adjustments to the MPFR be implemented without waiting for the full twelve-month period. Acting sooner would enable the market to realise cost savings earlier while still maintaining system security.

Final comments

We welcome the proposals that have resulted from the review and strongly encourage their implementation as soon as practicable. Having identified clear opportunities for improvement, we believe it is essential to establish an ongoing process to continuously identify and pursue enhancements across the WEM market rules and standards.

Thank you for considering this submission. Please do not hesitate to contact us should you wish to discuss any aspect further.

Sincerely,

WA Expert Consumer Panel

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