

15 December 2025

Dora Guzeleva
Director Wholesale Markets
Energy Policy WA
Level 1, 66 St Georges Terrace
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Submitted via email to: energymarkets@deed.wa.gov.au

Dear Ms Guzeleva,

Western Power response to Essential System Services Framework Review Consultation Paper

Western Power appreciates the opportunity to comment on the Essential System Services Framework Review. We support reforms that are aligned with the State Electricity Objective and deliver clear benefits for customers and Market Participants.

Western Power supports the review of the ESS requirements in the WEM to ensure they are set at an efficient level that balances security and reliability of supply with cost to consumers. Western Power is supportive of all proposals. However, we provide further comments below regarding Proposal 3.

Proposal 3 - Increase the RoCoF Safe Limit from 0.25 Hz per 0.5 seconds to 0.75 Hz per second to reduce the need for AEMO intervention

The consultation paper highlights that AEMO has gained sufficient real time market operation experience to increase the RoCoF Safe Limit, which was set conservatively ahead of WEM market start, to a value more aligned with other modern power systems that establish RoCoF Safe Limits of 1 Hz per second.

Prior to market start, Western Power sought accreditation of RoCoF ride-through capability for its transmission and distribution systems under clause 2.34A.12B of the ESMR. AEMO approved the accreditation at a level of 1.2Hz over 500 milliseconds. Western Power collaborates directly with AEMO with regards to aspects of its RoCoF accreditation and continues to provide updates and further information as required – for example, should any RoCoF sensitive equipment in the distribution or transmission network operate during a RoCoF event or results of RoCoF testing undertaken during maintenance or upgrades for specific equipment.

On this basis, Western Power supports Proposal 3 to increase the RoCoF Safe Limit to 0.75 Hz per second, subject to ongoing coordination with AEMO and continued monitoring of RoCoF-sensitive equipment on the network.

Should you have any queries, please contact **Andy Kondola** (Energy Market Regulation Manager) by email at andy.kondola@westernpower.com.au.

Yours sincerely

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