Department of
Energy and Economic Diversification
GOVERNMENT OF WESTERN AUSTRALIA

Response to Stakeholder Submissions

Exposure Draft: proposed amendments to the Electricity (Standard Products) Wholesale Arrangements (2026)

Response to Stakeholder Submissions

The Department of Energy and Economic Diversity (DEED) developed amendments to the *Electricity (Standard Products) Wholesale Arrangements 2014* (Wholesale Arrangements), an instrument formed under the Electricity Generation and Retail Corporation (EGRC) Scheme.

An exposure draft of the proposed amendments to the Wholesale Arrangements was published on the Coordinator of Energy's website for public consultation on 12 May 2026.

To see a summary of the proposed changes, please refer to the Exposure Draft: Proposed Amendments to the Electricity (Standard Products) Wholesale Arrangements.

Electricity Generation and Retail Corporation (EGRC) Scheme

The EGRC Scheme was introduced in response to the merger of Verve Energy and Synergy on 1 January 2014, to mitigate the potentially adverse effects of the merger on competition in the Wholesale Electricity Market. Among other things, the EGRC Scheme requires the EGRC (Synergy) to provide Standard Products, being fixed quantities of wholesale electricity supply available for sale and purchase at published prices. The Wholesale Arrangements outline the products Synergy must offer and the minimum quantities that must be made available.

The Economic Regulation Authority must review the EGRC Scheme every two years. In its 2025 review, the ERA recommended 3 amendments to the Wholesale Arrangements:

- require Synergy to publish further detail on its standard product pricing method;
- rectify an error introduced in 2023 to ensure that Synergy is restricted from offering buy-side standard products to entities with market power; and
- update outdated references, for example, provisions relating to the now abolished Clean Energy Act 2011 (Cth).

The amendments implement the ERA's recommendation changes to the Wholesale.

The *Electricity (Standard Products) Wholesale Arrangements Amendment Instrument 2026* was approved by the Minister for Energy on 3 August 2026 and a notice of its making was published in the Government Gazette on 11 August 2026.

Responses to Submissions

Public consultation on the Exposure Draft closed on 9 June 2026 and DEED received one public submission. A copy of these submission can be found here.

DEED also held a one-on-one discussion with Synergy to clarify aspects of its submission.

DEED considered all stakeholder feedback on the Exposure Draft before finalising the amendments to the Wholesale Arrangements and has provided a response to the feedback in the table below.

Table 1: Issues raised by stakeholders

Submitter	Comment/Issue Raised	DEED Response
Synergy	Synergy proposes to commence the amendments on 30 September 2026 to provide Synergy with a reasonable time to implement the new requirements.	DEED supports this amendment and has implemented this commencement date.
	Synergy proposes to amend clause 5.1(f) to only require Synergy to republish the information described in clause 5.1(e) when there has been a ‘material’ amendment. This ensure that Synergy does not need to republish when undertaking inconsequential amendments such as typographical error correction.	DEED supports this amendment and has implemented this change in the final amendments.
	Synergy proposes amending clause 6.5(c) relating to Force Majeure Events to allow Synergy to apply for Force Majeure if in aggregate 15% of EGRC Facilities are impacted.	DEED cannot implement this proposal as this clause already accounts for situations where there is a 20% reduction on generation/supply and it would be inconsistent and inappropriate to add an additional subclause carve-out of a 15% reduction.
	Synergy proposes expanding the list of EGRC Facilities and Specified Plant to capture new large facilities for which Synergy is the owner as well as large new Power Purchase Agreements (PPAs). Synergy also proposes to publish this list on Synergy’s website, rather than enshrining it in the Wholesale Arrangements to provide for faster and greater market transparency of changes to these facility lists.	DEED agrees that changes to the two facility lists will be required in the future as Synergy’s fleet and PPAs evolve. The definitions of EGRC Facilities and Specified Plant will be revised during the 2027 review of the EGRC scheme, including capturing any new large facilities and large PPAs.