

7 October 2026

Attn: Dora Guzeleva
Director, Wholesale Markets
Energy Policy WA
Level 1, 66 St Georges Terrace
Perth WA 6000

By email: energymarkets@deed.wa.gov.au

Dear Ms Guzeleva,

Operational Forecasting in the WEM Review – Consultation Paper

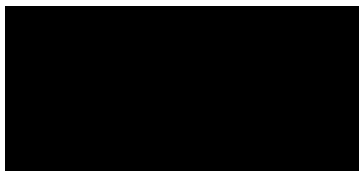
Thank you for the opportunity to comment on Energy Policy WA's *Operational Forecasting in the WEM Review Consultation Paper*.

APA recognises that accurate operational forecasting is essential to maintaining a secure, reliable, and efficient energy market. APA is supportive of the proposals outlined in the Consultation Paper, including the requirement for the Coordinator of Energy to review intermittent generation forecasting by 1 December 2029 to determine if the reforms have driven improvements.

APA's responses to the proposals and consultation questions are attached.

Should you have any questions or wish to discuss our submission please contact Liz Gharghori, Markets Manager on [REDACTED].

Yours sincerely,



Patrick Whish-Wilson
Senior Manager Market Regulation
Regulation and External Policy

Responses to consultation questions

Proposals & consultation questions	APA response
Proposal 1: AEMO should review its approach to persistence forecasting and how these forecasts are blended with foundation forecasts. AEMO should consider shortening the period over which it blends these forecasts, blending differently for different sites, or not blending at all and adopting an alternate approach. Consultation Questions: (1) Do stakeholders have any concerns with AEMO altering its approach to blending forecasts?	APA supports AEMO reviewing and altering its approach to forecasting. Blended forecasts are less valuable over a longer time horizon. Accordingly, we support shortening the period over which blending occurs, for example, blending forecasts within the Week-Ahead Schedule Horizon.
Proposal 2: AEMO should enhance collaboration with a number of weather providers to improve weather forecasts used in demand forecasting and especially for intermittent generation resource availability forecasts. Specifically, the focus should be on improving the quality, frequency, and understanding of uncertainty of weather forecasts, and enabling delivery of these forecasts in a state that can inform market forecasts. Consultation Questions: (2) Do stakeholders see a role for participants to provide or utilise additional site-specific data in forecasting?	APA supports enhancing AEMO's collaboration with weather providers to drive overall improvements in forecasting. Where participants are able to provide site-specific weather data to inform forecasting (i.e., where the necessary tools and settings are in place), this should be provided to AEMO. It would be useful for AEMO to report on the uncertainty of weather forecasts and changes based on conditions. For example, there are times when meteorologists can be more confident in their forecasts, and understanding the difference is useful information for participants to make more informed decisions regarding their assets and portfolio.
Proposal 3: AEMO should continue to develop documentation of its forecasting process, including how it is implemented in its forecasting model, as well as a technical specification for the model. AEMO should review the use of its separate development and production environments for its forecasting system and the change management processes in place. Consultation Questions: (3) Do stakeholders have any concerns with AEMO enhancing documentation and reviewing internal forecasting practices?	APA supports AEMO documenting its forecasting process to improve transparency for participants. Regarding the use of separate development and production environments for its forecasting system, APA's key concern is the accuracy of information that becomes available to participants in production. Participants act on information and have a reasonable expectation that it will be correct and made available to all participants at the same time.

Proposal 4: Intermittent generation forecasts used in WEMDE should be produced by AEMO. Participants should be required, under the rules, to provide necessary information for AEMO to produce these forecasts. Consultation Questions: (4)(a) Do stakeholders support introducing a centralised forecasting approach with AEMO producing intermittent generation forecasts for use in WEMDE? (4)(b) Do stakeholders have concerns about providing the required information to enable AEMO to produce intermittent generation forecasts to be used in WEMDE? (4)(c) Do stakeholders have any views on the allocation of the implementation costs to move towards a centralised forecasting approach? (4)(d) Do stakeholders anticipate challenges in providing the type of data required to AEMO in a timely manner? (4)(e) Do stakeholders have any views on the proposed treatment of hybrid facilities?	(4)(a) APA's understanding of the Consultation Paper is that Energy Policy WA intends for all semi-scheduled facilities (SSF) that meet the classification criteria, to be classified as a centrally forecasted facility (CFF) on a mandatory basis. However, we do not consider that the Exposure Draft reflects this intention. Sub-clause 2.34D.1. states that: <i>A Semi-Scheduled Facility is eligible for classification as a Centrally Forecasted Facility...</i> Using the term 'eligible' does not suggest that such classification is mandatory for existing facilities. It would be helpful for Energy Policy WA to clarify its intention here. APA considers that AEMO should retain its current flexibility to use participant forecasts or their own forecasts in WEMDE. Existing participants who can demonstrate that they have not produced materially inaccurate forecasts over the long term, should retain the ability to self-forecast. (4)(b) APA does not have concerns with providing the required information outlined in the consultation paper on page 29. (4)(c) Regarding implementation costs, these should be shared across all participants, as improvements in forecasting are intended to benefit the market as a whole.
Proposal 5: A rule obligation should be introduced for AEMO to publish metrics for the tracking of forecast and backcast errors for its operational forecasting. Consultation Questions: (5) Do stakeholders support the introduction of an obligation for AEMO to publish metrics of forecast and backcast errors?	APA supports a requirement for AEMO to publish forecast accuracy metrics on a regular basis. We support the proposal to apply a less costly solution so that AEMO's forecast accuracy reports will include measures of the forecast accuracy of the main weather inputs such as wind speed and solar irradiance levels.