

2026 BENCHMARK TECHNOLOGY REVIEW — DRAFT DETERMINATION

SUBMISSION

Empire Carbon & Energy submission on the Coordinator of Energy's draft determination of 9 September 2026 — the fuel-supply basis of the proposed Benchmark Technologies, and the cost of new entry approach.

Prepared for	Coordinator of Energy — Department of Energy and Economic Diversification
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To: energymarkets@deed.wa.gov.au

Attention: Coordinator of Energy, Department of Energy and Economic Diversification

Date: 5 October 2026

Subject: Submission — 2026 Benchmark Technology Review, Draft Determination for consultation

Closing date: 5:00 pm WST, Wednesday 7 October 2026

This submission is provided for publication. It contains no confidential information.

Purpose. This submission responds to the 2026 Benchmark Technology Review Draft Determination for consultation, published 9 September 2026. It goes to methodology and internal consistency only. It takes no position on emissions policy or on whether an emissions intensity threshold should be introduced for the Reserve Capacity Mechanism, and none on the level at which the Fixed Capital Contribution has been set. The author took part in the WEM Investment Certainty Review Working Group meetings of 16 July and 6 August 2026 at which the draft analysis was discussed, and the Coordinator has recorded that discussion at section 2.6. Every figure below comes from the published Draft Determination or the published configuration workbook.

1. OUR ANSWER TO EACH OF THE THREE CONSULTATION QUESTIONS

Observation: The answers are below. The reasons follow in sections 2 to 9.

Question 1, the proposed Benchmark Peak Technology — no, not on the analysis as presented. The E-Class SCGT is the lowest fixed cost configuration only because the firm gas supply the Review elsewhere assumes it burns is left out of its cost build. On the Review's own figures, putting that cost back removes the whole of its advantage.

Question 2, the proposed Benchmark Flexible Technology — no, for the same reason. The Flexible ranking rests on the same cost build, and nothing in the Flexible service assessment cures the fuel-supply inconsistency.

Question 3, retaining a gross CONE approach — yes. Empire supports Proposal B. Section 6 sets out why the conclusion holds whichever fuel is assumed, although for a technology certified on distillate the Review reaches it through a different limb of its own criteria.

Basis: Draft Determination sections 2.6 and 3.7.

2. THE PROPOSED CONFIGURATION IS COSTED ON DISTILLATE AND ASSESSED ON GAS

Observation: The Review costs the proposed configuration as a distillate plant and assesses it as a gas plant. Both assumptions carry weight in the result, and they are not compatible.

On the cost side, the selected configuration is "certified on distillate, but assuming gas is the preferred fuel, with a skinny lateral included" (section 2.5). Because it is certified on distillate it carries no Dampier to Bunbury Natural Gas Pipeline capacity reservation. In the configuration workbook the maximum daily quantity for every dual fuel column is zero and the DBNGP capacity line is nil. Its fuel security is 36 hours of on-site distillate tankage, and the Review confirms at section 2.6 that no upstream distillate reservation cost is included either.

On the assessment side, the gross-versus-net CONE analysis models "a unit of the proposed Benchmark Technology — i.e., an E-Class SCGT (specifically a SGT5-2000E), running entirely on natural gas" (section 3.3). That gas assumption is what produces the finding that the technology is frequently the marginal energy supplier, which is the first limb of the criteria at section 3.2 for applying gross CONE. On distillate, the Review records, "the facility received no significant dispatch or revenues".

The same lateral is therefore absent and costless when the capital cost is built, and present and delivering gas when the technology is assessed.

The Review says as much in its own footnote. Appendix B.2, footnote 37, states that the possibility a new entrant "might in practice add functionality to choose differently or use both fuels to additionally trade in the energy markets is not included in the Benchmark Technology configuration". Section 3.3 then assesses precisely that behaviour. Appendix B.2 also describes the compressed lateral as what provides "the necessary firm capacity" for a gas-fuelled configuration, so on the Review's own definition the skinny lateral does not deliver firm gas.

The basis on which the benchmark is assessed shifts again between the long list and the cost build. The Review's method has one real-world filter, at step 2 of section 1.3: pre-filtering on technology readiness for service by 2029, which footnote 3 confines to "the maturity of the technology itself and not the lead time for developing a project". That is the ground on which fuel cells, vanadium and sodium BESS are set aside at Table 2, and it is applied consistently. The distillate-only configurations are not set aside on that ground. They are set aside because the Coordinator "does not consider that a distillate-only facility would be built in the South West Interconnected System", with the environmental limb of the State Electricity Objective and the Real-Time Market price consequence given in support.

Whether a facility would be built is not a test the method contains, and it is the test the Executive Summary disclaims: the Benchmark Technologies "do not represent an expectation of the actual technologies that will or should enter the market in the future". A distillate-fired E-class frame is the same mature machine the Review has selected, certified differently and without a gas lateral. Empire does not suggest it should be the Benchmark Technology, and takes no position on the

emissions question raised in that passage. The point is narrower: a consideration that excludes one configuration should be available to test the configuration that was selected. If what would be built governs, the Review's own Appendix B.2 — that gas turbine manufacturers "shuttered facilities while demand was low" and that "manufacturing capacity has not yet responded to increased demand" — bears on the selected configuration. If it does not govern, the distillate-only exclusion rests on the two consequence arguments alone.

Each of these choices runs the same way. A buildability test is applied where it excludes the cheaper configuration. It is not applied — and the benchmark is notional — where it would add firm gas transport cost to the selected configuration, or bring the supply constraints the Review describes at Appendix B.2 to bear on it. Empire does not suggest the tests were chosen in order to produce that result, and nothing in this submission should be read that way. But the direction of effect is consistent across each choice, and on its face that is a pattern the final determination should explain rather than leave to inference.

- **Recommendation:** the final determination reconcile the fuel-supply basis across the cost build and the CONE assessment — either cost the firm gas supply the assessment assumes, or assess the technology on the fuel for which it is costed.
- **Recommendation:** the final determination state which test governs the composition of the long list and the short list — technology readiness as defined at footnote 3, service requirements, or whether a configuration would be built — apply the same test to the selected configuration as to those excluded, and explain the difference in treatment where a different test has been applied.

Basis: Draft Determination Executive Summary; sections 1.3 and footnote 3, 2.1, 2.5, 2.6, 3.3 and 3.5; Table 2; Appendix B.2 and footnote 37; Appendix B.4; configuration workbook, Calculations sheet, rows "DBNGP capacity" and "Gas connection".

3. ON A CONSISTENT FUEL BASIS THE PROPOSED CONFIGURATION IS NOT THE LOWEST FIXED COST TECHNOLOGY

Observation: Reconciling the fuel basis does not narrow the proposed technology's advantage. It removes it.

The configuration workbook already holds both fuel cases for each machine. The dual fuel column carries a skinny lateral and no pipeline reservation; the gas-only column carries a compressed lateral sized for 14 hours of fuel and a DBNGP capacity charge. Using the workbook's own figures, unchanged, for the proposed SGT5-2000E:

Basis	\$/MW/year, \$2029	Against the 7-hour BESS at \$464,536
As proposed — certified on distillate, no firm gas transport	344,893	25.8% lower
Firm DBNGP reservation added, skinny lateral retained	458,299	1.3% lower
Certified on gas — the workbook's own gas-only column	483,857	4.2% higher

The middle row is the **minimum adjustment**. It adds only the pipeline reservation that the everyday gas running assumed at section 3.3 requires and leaves the lateral as costed. That alone takes the 26 per cent margin reported at section 2.5 to a little over one per cent. The third row is the Review's own gas-only figure, and on it the seven-hour BESS is the lowest fixed cost technology. No other gas-only configuration in the shortlist is cheaper than the seven-hour BESS; the next is the GT13E2 at \$490,919 per MW per year.

The DBNGP capacity charge omitted from the proposed configuration is \$103,544 per MW per year in 2026 dollars, or \$113,407 escalated on the workbook's own basis — a third of the proposed benchmark price of \$344,893. The lateral is the remainder: \$28.8 million as costed, against \$95.6 million for the compressed lateral.

Empire does not ask the Coordinator to adopt a particular technology. It asks that the ranking be settled on a fuel basis that is the same on both sides of the calculation, and that the reconciled figures be published so the selection can be seen to follow from them.

One consequence of the reconciliation is worth stating plainly. At the margin the middle row leaves — \$6,237 per MW per year, or 1.3 per cent — the ranking becomes sensitive to assumptions that are immaterial at 26 per cent. The land rate is one: it is applied as a single average across eight sites ranging from \$20,000 to \$1,500,000 per hectare, and the seven-hour BESS occupies 12.1 hectares against 2.6 for the proposed configuration, so the choice of rate is worth of the order of \$4,100 per MW per year between them. The amortisation period at section 7 and the network location at section 8 are others. Once the fuel basis is corrected, the sensitivities requested below are not housekeeping — they are what decides the determination.

- Recommendation: the final determination publish the estimated BRCP for each shortlisted configuration on a consistent fuel basis, showing the dual fuel configurations both as costed and with the firm gas transport the CONE assessment assumes.
- Recommendation: where a configuration is retained on a basis that assumes gas running, its cost build include the DBNGP capacity reservation required to deliver that gas.

Basis: Configuration workbook, Calculations sheet, rows "DBNGP capacity", "Gas connection", "Total annual costs" and "- escalate to \$2029", columns SCGT_SGT5-2000E_DF, SCGT_SGT5-2000E_GasOnly, SCGT_GT13E2_GasOnly and BESS_7hr; Draft Determination section 2.5 and Table 3; ERA WEM Procedure: Benchmark Reserve Capacity Prices, Version 9, clauses 3.5.4, 3.5.5 and 3.5.7.

4. FIRM GAS TRANSPORT IS A FIXED COST, AND THE WORKBOOK TREATS IT AS ONE

Observation: The Review's answer to the Working Group is that gas costs belong in variable costs. Its own workbook classifies them as fixed, and its own definition of the BRCP does not allow a fixed cost of the benchmark to be recovered elsewhere.

At section 2.6 the Review responds that "any cost related to the plant operation on gas would be part of its variable costs and the cost for that would be recovered through the Real-Time Market (opportunistic or from the broader Market Participant portfolio) rather than be charged to the RCM". There are three difficulties with that.

A DBNGP capacity reservation is not a variable cost. It is charged on maximum daily quantity for every day of the year whether or not gas flows, and the workbook treats it accordingly: the DBNGP capacity line sits inside the Fixed Operations and Maintenance block of the Calculations sheet,

computed as $MDQ \times 365 \times \text{tariff}$, and Appendix B.4 lists it among the items included in the estimates of FOM. The Benchmark Technology is defined by reference to the lowest annual capital and fixed operating and maintenance costs. A charge the Review itself books to FOM cannot be taken out of that comparison on the ground that it is variable.

The Executive Summary states that "the BRCP will be determined to reflect a price that will allow the Benchmark Technologies to recover all of their capital and FOM costs without any other market revenue", and that it is the other technologies, carrying higher costs, that recover through energy and Essential System Services revenue. Directing a fixed cost of the benchmark itself to the Real-Time Market is inconsistent with the basis on which the benchmark price is set.

The alternative offered — recovery "from the broader Market Participant portfolio" — is not available to the facility being priced. The Benchmark Technology is a notional new facility standing alone; a portfolio is the one thing it does not have. That was put to the Coordinator at the 6 August meeting, is recorded at section 2.6, and the Review does not answer it.

- Recommendation: the final determination state whether the DBNGP capacity reservation is treated as a fixed or a variable cost, and reconcile that treatment with its inclusion in Fixed Operations and Maintenance in the configuration workbook.
- Recommendation: the final determination state how a notional standalone new entrant is assumed to obtain gas in Peak and Flexible capacity intervals without a firm transport contract and without a portfolio.

Basis: Draft Determination Executive Summary, sections 2.6 and 3.3, Appendix B.4; ESM Rules definition of Benchmark Technology; configuration workbook, Calculations sheet, FOM block.

5. THE DISTILLATE-RUN RESULTS HAVE NOT BEEN PUBLISHED

Observation: The Coordinator undertook at the 6 August Working Group meeting to present results for the technology running on gas and on distillate. The paper presents the gas case and withholds the distillate case.

Footnote 29 records that the distillate scenario was modelled, and that "the resulting dispatch was so low that the resulting captured prices are considered spurious as they are based on too few Trading Intervals. Therefore the results are not presented in this paper."

The distillate case is not a marginal sensitivity. It is the fuel for which the technology is certified, the fuel for which it is costed, and — on the Review's own account of low dispatch — the case that decides whether the first limb of the section 3.2 criteria is satisfied. Stakeholders are asked to agree with a technology on the strength of results for a fuel supply that is not in its cost build, while the results for the fuel that is have been withheld. Low dispatch and few trading intervals are themselves the finding; publishing the interval count alongside the result is what allows a reader to weigh it.

- Recommendation: the final determination publish the distillate-run modelling results — dispatch, captured price and net revenue — together with the number of trading intervals on which they are based.

Basis: Draft Determination sections 3.2 and 3.5 and footnote 29; WEM Investment Certainty Review Working Group, meeting of 6 August 2026.

6. GROSS CONE IS SUPPORTED, AND THE CONCLUSION HOLDS ON EITHER FUEL

Observation: Empire supports Proposal B. The conclusion is right on either fuel, but the Review reaches it through the first limb of its criteria, and that limb depends on the gas assumption.

The criteria at section 3.2 apply gross CONE where the reference technology would be the marginal energy supplier. The Review finds that it would be, on the strength of the modelling at section 3.3 in which the technology runs entirely on natural gas. On distillate it is rarely dispatched, so on the fuel for which it is certified the first limb is not satisfied and the criteria direct a further assessment.

That further assessment lands in the same place. Where the technology runs on distillate the Review records that there is no material difference between gross and net CONE. Where it runs on gas the difference is real but modest, and the reasons given for preferring gross — that a net calculation requires forward-looking revenue forecasts "highly sensitive to input assumptions", and that the resulting uncertainty may deter investment — apply with more force to a standalone new entrant, which cannot smooth that uncertainty across a portfolio.

Empire's support for gross CONE is therefore not contingent on the fuel question in section 2, and the reconciliation asked for in section 3 does not disturb Proposal B. It is worth recording that the two are separable.

- Recommendation: retain the gross CONE approach, and state in the final determination which limb of the section 3.2 criteria the conclusion rests on for a technology certified on distillate.

Basis: Draft Determination sections 3.2, 3.5, 3.6 and 3.7.

7. THE FIFTEEN-YEAR ANNUALISATION IS PRESCRIBED, AND THE BENCHMARK IT WAS SET AGAINST HAS CHANGED

Observation: The fifteen-year annualisation is required by the WEM Procedure and is not the Coordinator's to justify. What has changed is the asset it would be applied to, and that is a matter for the Authority's review of the Procedure.

Clause 2.2.3(a)(ii) of the Economic Regulation Authority's WEM Procedure for the Benchmark Reserve Capacity Prices requires the capital cost to be "annualised over a 15-year period using a nominal Weighted Average Cost of Capital". It is expressed of the Benchmark Technology generally, whatever that technology is. Appendix B.7's record that "15 years applied to all technologies in discussion with DEED", and the configuration workbook's attribution of the figure to the Authority's determination spreadsheet, are consistent with it. Empire does not suggest the Review should have departed from the Procedure, and takes no issue with the period as applied.

One thing in this Review is the Coordinator's own choice. Table 3 records that the amortisation period for thermal plant "has been adjusted down to 15 years from 25 years in the 2025 review, better reflecting the financing period of these plants". The comparison that ranks the candidate configurations therefore rests on a different basis from the one used a year ago, and the period is not a neutral parameter — it sets the annualised capital cost that decides the ranking. No evidence is offered for the change.

There is a further point, and its venue is not this determination. The prescribed fifteen years was settled against a benchmark whose economic life is fifteen years — the storage configuration Table

3 gives a twenty-year technical life. The configuration now proposed carries a twenty-five year economic life and a thirty-five year technical life. A period that matches the asset for storage does not match it for thermal plant. Because a change of Benchmark Technology obliges the Authority to review the Procedure, that is where the question should be settled, rather than carried across without examination.

- Recommendation: the final determination state the basis for adjusting the amortisation period for thermal plant from twenty-five years to fifteen between the 2025 and 2026 reviews, and publish the least-cost ranking on the twenty-five year basis used in 2025 as a sensitivity.
- Recommendation: the determination record, for the Authority's review of the WEM Procedure, that the fifteen-year annualisation at clause 2.2.3(a)(ii) was settled against a benchmark with a fifteen-year economic life and would be applied to plant with a twenty-five year economic life and a thirty-five year technical life.

Basis: Draft Determination Table 3 and Appendix B.7; ERA WEM Procedure: Benchmark Reserve Capacity Prices, Version 9, clause 2.2.3(a)(ii); configuration workbook, Parameters sheet, "Amortisation period".

8. NO UNCONGESTED NETWORK LOCATION HAS BEEN DETERMINED

Observation: The paper states in the body that the location has been identified on information from Western Power, and in the appendix that it is assumed and will be settled after this consultation closes. Clause 4.16.12(c) requires the Coordinator to determine it, and clause 4.16.13 requires consultation on that determination.

Section 2.2 states: "Based on information provided by Western Power, DEED has identified that a node on the Clean Energy Link North is the appropriate unconstrained Network location." Appendix B.5 states that the link "is assumed to be unconstrained at the likely time of Reserve Capacity dispatch because a large amount of renewable generators is usually not injecting energy at this time", and that "a review of any additional information from Western Power where available, will be undertaken before deciding on the treatment of this parameter". The longlist criteria at section 2.2 separately assume that the transmission infrastructure "has sufficient capacity for the facility". Empire would welcome the Western Power material if it exists; if it does not, the position is that the location has not yet been determined.

This matters because of how the Rules treat that parameter. The network location is a parameter under clause 4.16.12(c). Clause 4.16.13 requires the Coordinator to consult with Market Participants when making the determination of the clause 4.16.12 parameters, and clause 4.16.14(b) requires the determination of each of them to be published. This consultation is that consultation. A parameter to be settled afterwards, on information the Review records as not yet held, is not before stakeholders in a form they can respond to.

The reason offered also goes to a different question from the one the Rules ask. Under clause 4.20.5B a facility's Peak Capacity Credits are equal to the Network Access Quantity determined by AEMO under section 4.15. Network Access Quantity is allocated among competing facilities under Appendix 3, whose stated purpose is to prevent Capacity Credits being assigned to facilities with "insufficient access to the Network", and which allocates the available quantity so as to maximise the total where it is short. Whether renewable generation happens not to be injecting during a

Reserve Capacity dispatch interval **does not decide that allocation. The basis given in Appendix B.5 therefore does not reach the question clause 4.16.12(c) asks.**

Clean Energy Link North is also a difficult place to assume spare capacity. It is a \$1.2 billion upgrade of the 132 kV and 330 kV lines between Northern Terminal at Malaga and Three Springs, under construction since mid-2025 for completion at the end of 2027, undertaken to allow around 400 MW of existing wind generation and up to 1 GW of new renewable generation to connect. The capacity the Review treats as available is the capacity being allocated to those connections over the period before the 2029/30 Capacity Year. Selecting the link as the uncongested location assumes the notional facility obtains access ahead of the generation the link was built to carry.

Nor is the assumption neutral between the shortlisted configurations. No network-access derating is applied to any configuration in the workbook — the capacity credit multipliers it carries adjust for service eligibility and for storage duration, not for access. The proposed configuration injects 347.8 MW at the notional node where the seven-hour BESS injects 200 MW, and the BRCP is expressed per Capacity Credit, so a shortfall in Network Access Quantity would not fall on each configuration equally. The Review does not test this, and Empire does not put it higher than that.

It is worth noting how the location was arrived at. The eight candidate sites at Table 8 are identified by their distance from the DBNGP, averaged at 16 km, and the land rate applied to every configuration is the average of those same eight sites — from \$20,000 per hectare at Three Springs to \$1,500,000 per hectare at Neerabup, blended to \$536,250. **The notional location is therefore selected for proximity to gas, for a configuration costed on the basis that it does not require firm gas.**

- Recommendation: the final determination publish the Western Power information on which section 2.2 relies, or state that the uncongested network location has not yet been determined.
- Recommendation: the network location under clause 4.16.12(c) be determined and its basis published within this consultation, so that it can be responded to as clause 4.16.13 requires; and if the Western Power information cannot be obtained in time, that the parameter be consulted on separately before the determination is made.
- Recommendation: the final determination publish the capacity-credit sensitivity if the network location proves constrained, including how a shortfall in Network Access Quantity would fall across configurations of different injection size.

Basis: Draft Determination section 2.2, Appendix B.5 and Table 8; configuration workbook, "Land cost" sheet and Calculations sheet capacity credit multipliers; ESM Rules clauses 4.16.12(c), 4.16.13, 4.16.14(b), 4.20.5B and Appendix 3; Clean Energy Link — North, Government of Western Australia, stateofenergy.wa.gov.au/Projects-and-Initiatives/clean-energy-link, accessed 30 September 2026.

9. CORRECTIONS AND CLARIFICATIONS

Observation: Four matters in the published material look like inconsistencies of documentation rather than of substance. None of them changes the ranking. They are set out so they can be corrected.

The eight-hour BESS. In the Calculations sheet the proxy BRCP for the eight-hour BESS is its total annual cost multiplied by 8/7, giving \$579,729 per MW per year against a total annual cost of \$507,263. The six-hour column is scaled by 7/6, which is right for a configuration eligible for six-sevenths of its capacity. A configuration exceeding the seven-hour Electricity Storage Resource

Duration Requirement should not be scaled at all. The eight-hour BESS sits above the seven-hour on either treatment, so the shortlist is unaffected.

Owner's cost allowance. Appendix B.2 states that owner's cost allowances "have been applied as a 10% allowance in all cases". The Parameters sheet of the workbook carries 12 per cent for thermal plant. It would help to state which was used.

Escalation end date. Appendix B.7 describes escalation at 2.5 per cent a year "to date in 2028 that the calculation is to apply to". The workbook escalates to a BRCP date of 30 June 2029 and the results are labelled \$2029. The appendix text appears to be a carry-over.

WACC provenance. Appendix B.7 attributes the 10.85 per cent WACC to "ERA's then draft determination Section 4.6". The workbook attributes it to the ERA's 2026 BRCP final determination calculation spreadsheet. The figure is the same; only the citation differs.

- Recommendation: correct the eight-hour BESS eligibility scaling, and align the owner's cost allowance, the escalation end date and the WACC citation between the Draft Determination and the configuration workbook.

Basis: Configuration workbook, Calculations sheet, "Proxy BRCP - Peak", and Parameters sheet; Draft Determination Appendix B.2 and B.7.

CLOSING

One consequence of the technology choice is worth noting. The WEM Procedure the Economic Regulation Authority applies in determining the Benchmark Reserve Capacity Prices is written around the current storage benchmark: it specifies energy storage in megawatt hours, a lithium iron phosphate sub-chemistry, calendar fade and temperature-based degradation, and battery containers and their thermal management. It carries no provisions for fuel, for gas transport, or for reservation costs, because until now it has not needed any. A determination in favour of a dual fuel configuration therefore requires the Authority to write that treatment from the beginning — which is why, as the Scope of Work records, a rule change is already proposed to move the Authority's determination deadline to 15 March to allow time for it. Empire's concern is practical. If the fuel-supply basis is not reconciled in this determination, it passes to the Authority as an unreconciled input to a procedure being drafted around it. Settling it here is the cleaner course for both bodies.

Empire Carbon & Energy would welcome the opportunity to discuss any aspect of this submission, and is content for it to be published in full.

Yours sincerely,

Liz Aitken
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5 October 2026

SUMMARY OF RECOMMENDATIONS

Overview. The recommendations made through this submission are consolidated below by theme. Empire's central request is a single one: that the benchmark be ranked on a fuel-supply basis that is the same on both sides of the calculation, and that the reconciled figures be published.

Fuel-supply consistency (Sections 2, 3 and 4)

1. Reconcile the fuel-supply basis across the cost build and the CONE assessment — either cost the firm gas supply the assessment assumes, or assess the technology on the fuel for which it is costed.
2. Publish the estimated BRCP for each shortlisted configuration on a consistent fuel basis, showing dual fuel configurations both as costed and with firm gas transport included.
3. Where a configuration is retained on a basis that assumes gas running, include the DBNGP capacity reservation in its cost build.
4. State whether the DBNGP capacity reservation is treated as a fixed or a variable cost, and reconcile that with its inclusion in Fixed Operations and Maintenance in the workbook.
5. State how a notional standalone new entrant obtains gas in Peak and Flexible capacity intervals without a firm transport contract and without a portfolio.
6. State which test governs the composition of the long list and the short list — technology readiness as defined at footnote 3, service requirements, or whether a configuration would be built — and apply it to the selected configuration as to those excluded.

Modelling transparency (Sections 5 and 6)

7. Publish the distillate-run modelling results — dispatch, captured price and net revenue — with the number of trading intervals on which they rest.
8. Retain the gross CONE approach, and state which limb of the section 3.2 criteria the conclusion rests on for a technology certified on distillate.

Parameters that decide the ranking (Sections 7 and 8)

9. State the basis for adjusting the thermal amortisation period from twenty-five years to fifteen between the 2025 and 2026 reviews, and publish the least-cost ranking on the twenty-five year basis as a sensitivity.
10. Record, for the Authority's review of the WEM Procedure, that the fifteen-year annualisation at clause 2.2.3(a)(ii) was settled against a benchmark with a fifteen-year economic life and would be applied to plant with a twenty-five year economic life and a thirty-five year technical life.
11. Publish the Western Power information on which section 2.2 relies, or state that the uncongested network location has not yet been determined.
12. Determine the network location under clause 4.16.12(c) and publish its basis within this consultation, so it can be responded to as clause 4.16.13 requires; consult separately on the parameter if that information cannot be obtained in time.
13. Publish the capacity-credit sensitivity if the network location proves constrained, including how a shortfall in Network Access Quantity would fall across configurations of different injection size.

Corrections (Section 9)

14. Correct the eight-hour BESS eligibility scaling, and align the owner's cost allowance, escalation end date and WACC citation between the Draft Determination and the configuration workbook.