

7 October 2026

Department of Energy and Economic Diversification
Level 1, 66 St Georges Terrace
Perth WA 6000

By e-mail: energymarkets@deed.wa.gov.au

Dear Department of Energy and Economic Diversification

2026 BENCHMARK TECHNOLOGY REVIEW: DRAFT DETERMINATION FOR CONSULTATION

Thank you for the opportunity to respond to the 2026 Benchmark Technology Review: Draft Determination.

Enpowered is a Western Australian developer of grid-scale storage and renewable generation in the South West Interconnected System, and we appreciate the ongoing engagement with Energy Policy WA across the reform program.

Executive Summary

Enpowered supports both proposals. We agree the BRCP should reflect the cost of new entry of the lowest-cost technology capable of meeting the capacity requirement, and we support the retention of gross CONE.

We note that the proposed Benchmark Technology rests on a set of finely balanced assumptions about fuel source and operation, which could reasonably have been resolved either way. Our interest is less in the outcome than in participants being able to see how much of the benchmark turns on assumptions of this kind. We would encourage the sensitivity of the BRCP to the discretionary assumptions in the cost build to be published alongside the proxy workbook.

More broadly, the cumulative effect of methodology changes across the reform program on investment certainty is not a matter this consultation is directed to, and we would welcome the opportunity to discuss it separately.

Proposal A

Enpowered supports the principle that the BRCP should reflect the cost of new entry of the lowest-cost technology capable of meeting the capacity requirement. Where a technology delivers that requirement more cheaply, it should set the benchmark, and a lower BRCP is the methodology working as intended.

We note DEED's decision and the Working Group's feedback on the fuel source and operations of the proposed Benchmark Technology. The capacity obligation is met on distillate, while the emissions position and the gross CONE analysis both rest on the facility running primarily on gas, for which no firm entitlement is included in the cost build. These are finely balanced assumptions that could reasonably have been resolved either way, and we support the decision reached by DEED.

Proposal B

Enpowered supports the retention of gross CONE.

Net CONE would require forecasting energy and Essential System Services revenues in markets whose recent outcomes have been volatile. That forecast becomes another discretionary input, reset annually, that participants cannot control or hedge. Enpowered agrees this deters investment and undermines cost efficiency and reliability.

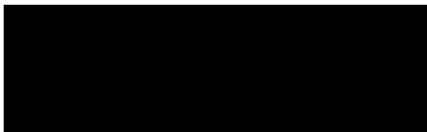
Further Transparency

The publication of the proxy BRCP workbook alongside the Draft Determination is a welcome improvement in transparency and allows participants to trace how the proposed benchmark is derived.

We would encourage this to extend to showing the sensitivity of the BRCP to the discretionary assumptions in the cost build, so that participants can see how much of the outcome turns on judgement rather than observed cost or a rule requirement.

We would be pleased to discuss any aspect of this submission further.

Yours sincerely,



Linh Le
Director
Enpowered