Department of Energy and Economic Diversification
GOVERNMENT OF WESTERN AUSTRALIA

Energy Policy WA

Meeting Agenda

Meeting Title:	Market Advisory Committee (MAC)
Date:	Thursday 3 September 2026
Time:	1:00 PM – 3:00 PM
Location:	Online via TEAMS

Item	Item	Responsibility	Type	Duration
1	Welcome and Agenda • Conflicts of interest & Competition Law	Chair	Noting	2 min
2	Meeting Apologies/Attendance	Chair	Noting	1 min
3	Minutes of Meeting 2026_07_30 • Published 26 August 2026	Chair	Noting	1 min
4	Action Items	Chair	Noting	2 min
5	ERA Pre-Rule Change Proposal	ERA	Discussion	30 min
6	Coordinator's review of the Benchmark Technologies	Chair	Discussion	15 min
7	Update on Working Groups			
	(a) AEMO Procedure Change Working Group	AEMO	Noting	2 min
	(b) AEMO Major Projects Working Group	AEMO	Verbal Update	2 min
	(c) WEM Investment Certainty (WIC) Review Working Group	Working Group Chair	Discussion	45 min
8	WEM Effectiveness Review – Progress Update	Chair/Secretariat	Noting	1 min
9	Market Development Forward Work Program	Chair/Secretariat	Noting	2 min
10	Overview of Rule Change Proposals	Chair/Secretariat	Noting	1 min
11	General Business	Chair	Discussion	15 min
	Next meeting: 15 October 2026			

Please note, this meeting will be recorded.

Competition and Consumer Law Obligations

Members of the MAC (**Members**) note their obligations under the *Competition and Consumer Act 2010* (**CCA**).

If a Member has a concern regarding the competition law implications of any issue being discussed at any meeting, please bring the matter to the immediate attention of the Chairperson.

Part IV of the CCA (titled "Restrictive Trade Practices") contains several prohibitions (rules) targeting anti-competitive conduct. These include:

(a) **cartel conduct**: cartel conduct is an arrangement or understanding between competitors to fix prices; restrict the supply or acquisition of goods or services by parties to the arrangement; allocate customers or territories; and or rig bids.

(b) **concerted practices**: a concerted practice can be conceived of as involving cooperation between competitors which has the purpose, effect or likely effect of substantially lessening competition, in particular, sharing Competitively Sensitive Information with competitors such as future pricing intentions and this end:

- a concerted practice, according to the ACCC, involves a lower threshold between parties than a contract arrangement or understanding; and accordingly; and
- a forum like the MAC is capable being a place where such cooperation could occur.

(c) **anti-competitive contracts, arrangements understandings**: any contract, arrangement or understanding which has the purpose, effect or likely effect of substantially lessening competition.

(d) **anti-competitive conduct (market power)**: any conduct by a company with market power which has the purpose, effect or likely effect of substantially lessening competition.

(e) **collective boycotts**: where a group of competitors agree not to acquire goods or services from, or not to supply goods or services to, a business with whom the group is negotiating, unless the business accepts the terms and conditions offered by the group.

A contravention of the CCA could result in a significant fine (up to $500,000 for individuals and more than $10 million for companies). Cartel conduct may also result in criminal sanctions, including gaol terms for individuals.

Sensitive Information means and includes:

(a) commercially sensitive information belonging to a Member's organisation or business (in this document such bodies are referred to as an Industry Stakeholder); and

(b) information which, if disclosed, would breach an Industry Stakeholder's obligations of confidence to third parties, be against laws or regulations (including competition laws), would waive legal professional privilege, or cause unreasonable prejudice to the Coordinator of Energy or the State of Western Australia).

Guiding Principle – what not to discuss

In any circumstance in which Industry Stakeholders are or are likely to be in competition with one another a Member must not discuss or exchange with any of the other Members information that is not otherwise in the public domain about commercially sensitive matters, including without limitation the following:

(a) the rates or prices (including any discounts or rebates) for the goods produced or the services produced by the Industry Stakeholders that are paid by or offered to third parties;

(b) the confidential details regarding a customer or supplier of an Industry Stakeholder;

(c) any strategies employed by an Industry Stakeholder to further any business that is or is likely to be in competition with a business of another Industry Stakeholder, (including, without limitation, any strategy related to an Industry Stakeholder's approach to bilateral contracting or bidding in the energy or ancillary/essential system services markets);

(d) the prices paid or offered to be paid (including any aspects of a transaction) by an Industry Stakeholder to acquire goods or services from third parties; and

(e) the confidential particulars of a third party supplier of goods or services to an Industry Stakeholder, including any circumstances in which an Industry Stakeholder has refused to or would refuse to acquire goods or services from a third party supplier or class of third party supplier.

Compliance Procedures for Meetings

If any of the matters listed above is raised for discussion, or information is sought to be exchanged in relation to the matter, the relevant Member must object to the matter being discussed. If, despite the objection, discussion of the relevant matter continues, then the relevant Member should advise the Chairperson and cease participation in the meeting/discussion and the relevant events must be recorded in the minutes for the meeting, including the time at which the relevant Member ceased to participate.

Department of Energy and Economic Diversification
GOVERNMENT OF WESTERN AUSTRALIA

Energy Policy WA

Agenda Item 4: MAC Action Items

Market Advisory Committee (MAC) Meeting 2026_09_03

Shaded	Shaded action items are actions that have been completed since the last MAC meeting. Updates from last MAC meeting provided for information in RED.
Unshaded	Unshaded action items are still being progressed.
Missing	Action items missing in sequence have been completed from previous meetings and subsequently removed from log.

Item	Action	Responsibility	Meeting Arising	Status
1/2026	AEMO to provide regular updates on proposals 4 and 5 from the Essential System Services (ESS) Framework Review. **Proposal 4:** AEMO to implement a monitoring program over a twelve-month period to track the amount of headroom and footroom available from unaccredited Facilities or non-dispatched FCESS Facilities to better quantify mandatory Primary Frequency Response (MPFR) availability to assess the level of Contingency Reserve Raise and Lower that could be provided from the inclusion of MPFR.	AEMO	2026_02_11	**Open** Proposals 4 and 5 from ESS Review will be retained in the action log for AEMO to provide regular updates. AEMO provided a preliminary update to the MAC on Proposal 4 of the ESS Review at the 30 July 2026 MAC meeting. AEMO will provide the next update at the first MAC meeting to be scheduled in 2027. AEMO provided an update on Proposal 5 under Agenda Item 5(d) at the 18 June 2026 MAC meeting.

Item	Action	Responsibility	Meeting Arising	Status
	Proposal 5: AEMO to assess the suitability of Synthetic Inertia (RCS) from Battery Energy Storage Systems (BESS) in complementing synchronous Inertia from rotating machines and consider potential barriers and suitable incentivisation for grid-forming BESS to provide such services.			
10/2026	EPWA to schedule a discussion for the December MAC meeting about the timing of commencing a review of the SESSM, considering any new information from the pre-operational deployment.	EPWA	2026_06_18	**Open**
15/2026	EPWA to provide Ms Burns with relevant Working Group Minutes from the Capability Class 2 Technologies Review Working Group	EPWA	2026_07_30	Working Group Minutes emailed to Ms Burns 31 July 2026 **Closed**

Economic Regulation Authority

Agenda Item 5: ERA Rule Change Proposal on timeframes for providing offer construction guidance and completing investigations

Market Advisory Committee (MAC) Meeting 2026_09_03

Purpose

The ERA is planning to develop a Rule Change Proposal to improve its effectiveness in relation to:

- Providing guidance on offer construction.
- Investigating non-compliant market behaviour.

The ERA seeks the MAC's feedback on the matters to be addressed by the Rule Change Proposal and the options presented. Before developing a Rule Change Proposal, the ERA consults the MAC and considers its input on whether, when and how to proceed (ESM Rule 2.5.1B).

Recommendations

That the MAC:

- Provide feedback on the matters and options raised in this proposal.
- Note that the ERA will refine and submit a Rule Change Proposal after considering the MAC's feedback.

Proposal

The Rule Change Proposal will consider amendments to the two areas of the ESM Rules that directly affect Market Participants:

1. The 6-month timeframe for completing investigations into potential non-compliance of ESM Rules regarding Irregular Price Offers. These amendments are intended to promote procedural fairness by providing Market Participants with a reasonable opportunity to consider and respond to alleged breaches, particularly given the potentially significant financial, operational and reputational consequences of an adverse finding.

2. The framework for requesting guidance on matters in the Offer Construction Guideline (OCG). While guidance can assist participants to understand regulatory expectations, the ERA does not seek to make or endorse participants' commercial decisions. The current framework may incentivise participants to seek regulatory assurance on matters that fall within their own purview of commercial judgement and risk management.

Part 1 Investigation timeframe

ESM Rules' clause 2.16C.8 states the ERA must complete an investigation of clause 2.16C.5 (Irregular Price Offers) within 6 months.

The ERA acknowledges that prompt delivery of investigation outcomes supports certainty about compliance obligations and enables timely enforcement action. While accountability and timely investigation outcomes are important, the fixed deadline does not sufficiently provide Market Participants with procedural fairness to consider breach allegations, and can create challenges where matters are complex, involve significant volumes of evidence, and have potentially significant consequences for Market Participants.[1]

Potential concerns for Market Participants and achieving the SEO

Limited time to respond to an investigation notice or preliminary findings

The matters investigated by the ERA can be complex, particularly where they involve assessing a Market Participant's offer construction methodologies, commercial decision-making and the resulting impact on market outcomes. Determining whether a Market Participant has acted reasonably may require consideration of extensive evidence and technical, commercial and operational context.

The current investigation framework does not adequately accommodate this complexity. Only two business days are added to the investigation timeline when the ERA receives a Market Participant's submission explaining an alleged breach (clause 2.16C.8A(b)).[2] As a result, when issuing a Preliminary Findings Report, the ERA must generally set a strict deadline for the participant to respond in order to complete the investigation within the six-month statutory timeframe.

The ERA is bound by the 6-month statutory deadline so generally has limited scope to provide Market Participants with additional time to consider the allegations, gather evidence, seek advice and prepare their response. As a result, Market Participants may not always have a reasonable opportunity to fully present their position before the ERA makes its final decision on investigation outcome. This is particularly significant given the potentially material financial, commercial and reputational consequences of a breach finding.

Options analysis

The ERA has identified several options to consider for discussion with the MAC:

1. Allow the ERA to extend the timeframe "if reasonably required".

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1 For instance, a breach of clause 2.16C.5 attracts a Category C civil penalty of up to $100,000 for the first contravention plus a daily amount of up to $20,000.

2 The investigation timeline is suspended if the ERA requests information from the Market Participant (clause 2.16C.8A(a)). The timeframe resumes when the Market Participant provides that information. However, this mechanism does not adequately address the position where a Market Participant provides a submission in response to the ERA's preliminary findings without a further information request. In that circumstance, clause 2.16C.8A(b) extends the investigation timeframe by only two business days from receipt of the submission.

2. Allow the ERA to specify a longer timeline in its Monitoring Protocol, which undergoes consultation when amended periodically.

3. "Stop the clock" when the ERA issues preliminary findings, to allow the Market Participant reasonable time to respond.

Part 2 Guidance timeframe

Market Participants with a Material or Material Constrained Portfolio may request guidance in relation to the Offer Construction Guideline (OCG) (ESM Rules' clause 2.16D.7). The ERA must respond to requests for guidance in relation to the OCG within 20 business days, unless it is already considering a prior request.[3] If the ERA requests additional information, that timeline is extended a further 20 business days from the date the additional information is received.

The ERA may amend the OCG at any time following stakeholder consultation (ESM Rule 2.16D.3).

Potential concerns for Market Participants and achieving the SEO

Regulatory guidance should not substitute for commercial decision-making

Market Participants benefit from clarity of regulatory obligations, and the ERA is committed to supporting well-functioning markets. The ERA's role is to provide general guidance to Market Participants, through the OCG, on how the ERA interprets the ESM Rules. Market Participants are expected to retain responsibility for commercial decisions and obtain their own legal and technical advice as required. This position is stated in the OCG.

A key risk of the current framework is that it can blur the distinction between regulatory guidance and commercial decision-making. Some requests seek guidance on how Market Participants should manage commercial risks or optimise operational strategies. These matters are often highly fact-specific and depend on a participant's individual commercial strategy, risk appetite and operational circumstances. There is a risk that participants may seek to transfer responsibility for these commercial judgements to the regulator, rather than taking responsibility for their own risk management and operational strategies.

Over time, this could shift the ERA's role beyond clarifying regulatory obligations towards effectively advising on business decisions and risk allocation. This is inconsistent with the principle that market participants are best placed to assess and manage their own commercial risks within the regulatory framework. The ERA's role should be to provide clear and predictable regulatory guidance, while preserving appropriate accountability for participants' commercial decisions and outcomes.

Delay of broader benefits to the SEO

Some guidance requests raise issues that are not unique to a single Market Participant, but instead reflect broader questions about the application of the OCG. These issues are often better addressed through frequent review and consultation on the OCG, allowing the ERA to

[3] The ERA's responses to prior requests for guidance are published on its website (online).

consider a range of perspectives and provide guidance that is transparent, consistent and available to all Market Participants.

In some cases, requests relate to novel or emerging issues that are still under regulatory consideration. Providing participant-specific guidance in these circumstances may be of limited value, particularly where the issue would benefit from broader market consultation and clarification through regular updates to the OCG.

Option analysis

The ERA considers that a more effective approach would be to replace the participant-specific guidance process under clause 2.16D.7 with a requirement to review and consult on the OCG at least every two years.

This would shift the focus from responding to individual requests towards a transparent, market-wide process for addressing recurring issues, emerging compliance risks and areas where further clarification is needed. Market Participants would continue to be able to raise offer construction concerns with the ERA, which would inform future OCG reviews and ensure guidance is developed consistently for the benefit of all Market Participants.

While reviews would be undertaken at least every two years, the ERA would retain discretion to initiate a review at any time where urgent issues, participant feedback or market developments indicate that clarification or amendment of the OCG is warranted.

Estimated costs of developing the Rule Change Proposal

The ERA anticipates expenditure on this project will be limited to existing internal resources (i.e. no external consultants required). The ERA anticipates minimal implementation costs for Market Participants.

Next steps

The ERA intends to refine and submit a Rule Change Proposal following the MAC's feedback.

Attachments

Agenda Item 5 - Attachment 1 – Supporting slide deck



Rule Change Proposal

Concept presentation to the Market Advisory Committee

Investigation and offer construction guidance timeframes

3 SEPTEMBER 2026

The ERA's role

The ERA's role in the WEM includes:

- Monitoring, investigating and enforcing Rule Participant behaviour
- Providing guidance to Market Participants on how to comply with certain obligations.
- Developing Rule Change Proposals

The MAC's role: Before developing a Rule Change Proposal, the ERA consults the MAC and consider its input on whether, when and how to proceed (ESM Rule 2.5.1B)

Rule Change Proposal

The ERA is planning to develop a Rule Change Proposal to improve its effectiveness in relation to:

1. Investigating non-compliant market behaviour
2. Providing guidance on offer construction

General comments

- Recognise the importance of a strong regulatory framework to support confidence in market operation, provide certainty of regulatory obligations and achieve the SEO
- Current timeframes may not always provide sufficient procedural fairness to investigate complex matters, potentially increasing risk of sub-optimal market outcomes for Participants
- Rigid framework can exacerbate info asymmetry between regulator and Rule Participants by limiting the regulator's ability to fully collect and assess evidence to reach evidence-based conclusions
- Proposed amendments seek to balance timeliness, procedural fairness, accountability and decision quality, supporting more effective regulatory outcomes and efficient market operation

2.16C.8

Timeframes to conduct investigation and MPs responses to preliminary findings

Current state

2.16C.8 The ERA must complete its investigation within 6 months.

2.16C.8A The timeframe is suspended if the ERA has requested information.

But a Market Participant may also make a submission without such a request, in which case the timeframe is only suspended 2 business days.

In comparison

ACCC

- 3 months for an initial assessment before deciding whether to escalate a matter
- If escalated, an in-depth investigation typically takes up to **12 months**, with highly complex matters taking longer

AER

- Not subject to a fixed investigation deadline
- May issue an infringement notice within **12 months** of forming a belief of breach

Concern for Market Participants and achieving SEO

Limited time to respond to investigation notice or preliminary findings – procedural fairness

Common goal

We all want effective, transparent regulation and clear obligations.

But the current ESM Rules:

- Limit Market Participants' time to respond to preliminary findings
- Require the ERA to make decisions in a timeframe that doesn't consider:
  - the complexity of matters being investigated
  - Impacts of a breach finding on Market Participants.

Options analysis

1. Allow the ERA to extend the timeframe “if reasonably required”

2. Allow the ERA to specify the timeline in its Monitoring Protocol WEM Procedure

3. “Stop the clock” when the ERA issues preliminary findings, to allow the Market Participant time to respond.

2.16D.7

Time to respond to requests for guidance on the Offer Construction Guideline

Current state

Market Participants with a Material or Material Constrained Portfolio may request guidance in relation to the OCG.

The ERA must respond to requests for guidance in relation to the OCG within 20 business days – unless there is prior request.

If the ERA requests additional information, that timeline is extended a further 20 business days from the date the additional information is received.

Concern for Market Participants and achieving SEO

Guidance no substitute for decision making: Regulator cannot determine/endorse how Market Participants should manage commercial risks or operate their business

Some guidance requests raise issues that are not unique to a single Market Participant, but instead reflect broader questions about the application of the OCG – appropriate to review OCG more frequently instead

Option analysis

Replace current framework of requesting guidance with requirement to review OCG every 2 years + discretion to review more frequently if needed

Market Participants can continue to discuss concerns with the ERA Secretariat on an informal basis. Any issues and resulting guidance will be incorporated into the next review

Allows sufficient analysis and consultation time on complex matters.



Next steps



Discussion

Department of Energy and Economic Diversification
GOVERNMENT OF WESTERN AUSTRALIA

Energy Policy WA

Agenda Item 6: Update on the Coordinator of Energy's review of the Benchmark Technologies

Market Advisory Committee (MAC) Meeting 2026_09_03

1. Purpose

The Chair of the WEM Investment Certainty Review Working Group to provide an update on the Coordinator of Energy (Coordinator) 2026 Benchmark Technology Review (Review).

2. Recommendation

That the MAC:

- notes that the slides in Attachment 1 are provided as background information on progress to date and will be taken as read;
- notes the draft minutes from the 6 August 2026 meeting of the WEM Investment Certainty Review Working Group in Attachment 2; and
- provides any additional comments on the draft proposals for:
  - the Peak and Flexible Benchmark Technologies; and
  - to apply gross Cost of New Entry (CONE) to the Benchmark Reserve Capacity Prices (BRCPs).

3. Background

The Coordinator is conducting a review, under clause 4.16.11 of the Electricity System and Market Rules, of the Benchmark Technologies, which are used to determine the BRCPs.

The Review includes assessment of both the Peak and Flexible Benchmark Technology to determine:

- the technology with the lowest fixed costs (capital and fixed Operating and Maintenance cost); and
- whether gross costs of new entry (CONE) or net CONE should apply.

The Review is utilising publicly available data sources, including CSIRO's GenCost report and AEMO's Inputs Assumptions and Scenarios Report. Regional (WA) adjustments are applied as appropriate, using public data sources to the maximum extent practicable.

The Coordinator must complete its review by the end of October 2026 to allow sufficient time for the Economic Regulation Authority to amend and consult on its BRCP methodology and set the BRCPs for the 2029/30 Capacity Year by 15 March 2027.

4. Consultation

Due to the Review's compressed timeline, Energy Policy WA is consulting with the WIC Review Working Group on the Review, instead of forming a special MAC Working Group.

The Working Group discussed the Benchmark Technology Review at meetings on 16 July and 6 August 2026.

At the meeting on 16 July 2026, the Working Group discussed the long and short list of candidate technologies, underlying assumptions and the cost assessment methodology.

At the 30 July 2026 meeting of the MAC on, DEED provided an update on the review, including a summary of the 16 July 2026 Working Group meeting.

At its 6 August 2026 meeting, Working Group discussion included:

- the draft proposals for the Peak and Flexible Benchmark Technology to be a dual-fuel E-Class Simple Cycle Gas Turbine certified on distillate with a “skinny” gas lateral running predominantly on gas; and
- the modelling results of the application of Gross or Net CONE, including a draft proposal to continue using a Gross CONE approach for the BRCPs.
    - Stakeholders were supportive of the draft proposal to continue applying a gross CONE approach to the BRCPs

Key issues raised by the MAC and the Working Group included:

- the decision not to apply an emissions intensity threshold[1];
- general regard of emissions under the State Electricity Objective (SEO); and
- whether a distillate-only (no gas lateral) configuration should be considered as a least cost alternative.

The MAC and Working Group members views were not consistent regarding the following proposals:

- to not assume an emission intensity threshold for the RCM - DEED has not changed this proposal after consulting with the Working Group because it reflects current conditions.
- to not include a distillate-only gas turbine in the long-list - DEED has not changed this proposal after consulting with the Working Group because it does not consider that a distillate-only facility would be built in the SWIS.

Some stakeholders opposed the proposal to include the cost of a gas lateral but no DBNGP gas reservation cost for the dual fuel technology. DEED has not changed the proposal after consulting with the Working Group because these costs don’t relate to the RCM and should be included in the variable costs.

Terms of Reference, papers and minutes for the Working Group meetings are available on the WIC Review Working Group webpage. Information on the Review is available here

5. Next Steps

MAC members will have an opportunity to provide feedback on the Consultation Paper through the four-week public consultation process.

The table below shows the expected timeline for the remaining steps of the review:

[1]The 2025 Review used the indicative proposal for an emissions threshold developed as part of the WIC Review in 2023. In mid-2025, when the analysis was undertaken, it was DEED’s expectation that the 0.55t CO2 / MWh policy may be implemented. Consequently the 0.55t CO2 / MWh constraint was imposed on the candidate technologies’ shortlisting process.
Subsequent to the 2025 analysis, there has not been any progress towards introducing the 0.55t CO2 / MWh limit. It is presently DEED’s best expectation that it will not be imposed within a timeframe relevant to this determination, which is why it has not been applied as a constraint.

Tasks/Milestones	Timing
(1) Initial Assessment	
(a) Initial assessment & WIC Review Working Group meetings on proposals	Completed
(2) Consultation Paper	
(a) Publish Consultation Paper on proposals	September 2026
(b) Submissions on the Consultation Paper close	September 2026
(3) Further Assessment	
(a) Further assessment based on submissions received	October 2026
(4) Coordinator Determination	
(a) Publish the Coordinator's Determination	October 2026

Attachment

(1) Agenda Item 6 – Attachment 1 – 2026 Benchmark Technology Review update

(2) Agenda Item 6 – Attachment 2 – WIC Review Working Group – 6 August 2026 Meeting – Draft Minutes

GOVERNMENT OF WESTERN AUSTRALIA

Department of
Energy and Economic Diversification

Benchmark Technology Review 2026

Update for MAC

Acknowledgement of Country

The Government of Western Australia acknowledges the traditional custodians throughout Western Australia and their continuing connection to the land, waters and community.

We pay our respects to all members of the Aboriginal and Torres Strait Islander communities and their cultures, and to Elders past and present.

Recap

Scope

- The objective of this 2026 review is to determine the most appropriate Benchmark Technology which:
  - maintains sufficient investment signals to ensure system security and reliability; and
  - by selecting the lowest fixed cost technology, ensure that customers don't overpay for capacity.
- The Coordinator must determine the technical and other parameters to be used for determining the Benchmark Technology, including its size and capabilities. In addition, this needs to account for the use of a network location with relatively low congestion.
- The Coordinator must determine the Benchmark Technology for:
  1. Peak Capacity; and
  2. Flexible Capacity.
- The Coordinator must also determine whether a gross or net Cost of New Entry approach should apply to calculating the BRCPs

Approach

1. Establish a long list of technologies
2. Pre-filter long list based on technology readiness and credibility for service by 2029
3. Create potential configurations of remaining technologies for assessment
4. Identify the requirements that must be met to provide each capacity service
5. Filter configurations based on service requirements
6. Identify cost data (based on the existing BRCP determination approach) for each configuration to deliver each capacity service
7. Identify additional data for determination of net Cost of New Entrant (CONE) assessment
8. Conduct market modelling to inform Benchmark Technology and Gross/Net CONE proposals
9. Develop Benchmark Technology and Gross/Net CONE proposals
10. Consultation and Determination

EPWA has completed steps 1-8 and results of step 9 are discussed in this presentation

Discussion at the 30 July MAC meeting

- Main topics discussed were:
  - The decision not to apply an emissions intensity threshold for the RCM in the assessment of the Benchmark Technology - MAC members expressed mixed views on this decision and the rational
  - General regard of emissions under the State Electricity Objective
  - MAC members supported the proposed long list - one member considered that a distillate-only facility should be included

Working Group Feedback – 16 July, 6 August, via email (1) - Emissions intensity threshold:

- Some stakeholders considered not applying the emission intensity threshold is inconsistent with the environmental limb of the SEO
- Some stakeholders supported not applying a threshold, considering that it better achieves the cost limb of the SEO and reflects current regulatory settings

Working Group Feedback – 16 July, 6 August, via email (2) - Distillate-only plant configurations:

- The analysis considered dual-fuel configurations (certified on distillate but primarily operating with gas) or gas only. Distillate-only configurations are not considered.
- Some stakeholders considered that distillate-only facilities (don't require a connection to the gas network) should be considered as this would likely result in a lower BRCP and therefore better address the cost limb of the SEO.

Working Group Feedback – 16 July, 6 August, via email (3) - Gas reservation:

- Costs for the dual fuel facilities include a “skinny” gas lateral and assume the plant runs primarily on gas. No fixed reservation costs are included.
- Some stakeholders considered that without gas reservation, the plant may not be able to access gas during the periods when Peak or Flexible capacity service may be called on.

DEED responses to feedback – Emissions intensity threshold:

- During the 2025 Review, it was DEED's expectation that the indicative emission intensity threshold developed under the WIC Review would be implemented and be part of the relevant requirements.
  - The threshold was applied as a constraint in the shortlisting process, eliminating some SCGT configurations.
- Since 2025 there has been no progress towards introducing the threshold and DEED's best expectation is that it won't be imposed in a timeframe relevant to this determination. Therefore no threshold is applied for the determination of the Benchmark Technologies
  - The impact of this change is that several SCGT technologies, including E-class turbines, are now eligible to be included in the shortlist, while they previously were not.
- The environmental limb of the SEO is still considered, in balance with the other limbs.
- If subsequent actions are taken to proceed with the threshold for the RCM, it may be included in future determinations
- DEED notes that:
  - The 2025 analysis showed that the selected SCGT running on gas would meet the emission intensity threshold initially but not over the considered timeframe, due to degradation.
  - The dual fuel SCGT would mainly run on gas as the marginal unit, so its emissions would be relatively low.

DEED responses feedback – Distillate-only plant configurations:

- DEED considers that a distillate-only facility is not a credible option for the Benchmark Technology because:
  - This would not be consistent with the environmental limb of the SEO; and
  - The Real Time Market price will increase significantly every time a distillate-only plant is dispatched in the Real Time Market, impacting the cost limb of the SEO.

DEED responses to feedback – Gas reservation:

- DEED considers that it would not be appropriate to include the costs for gas reservation:
  - For the dual fuel facilities, any cost related to the plants operation on gas would be part of its variable costs
  - 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 Reserve Capacity Mechanism

Technology Costs

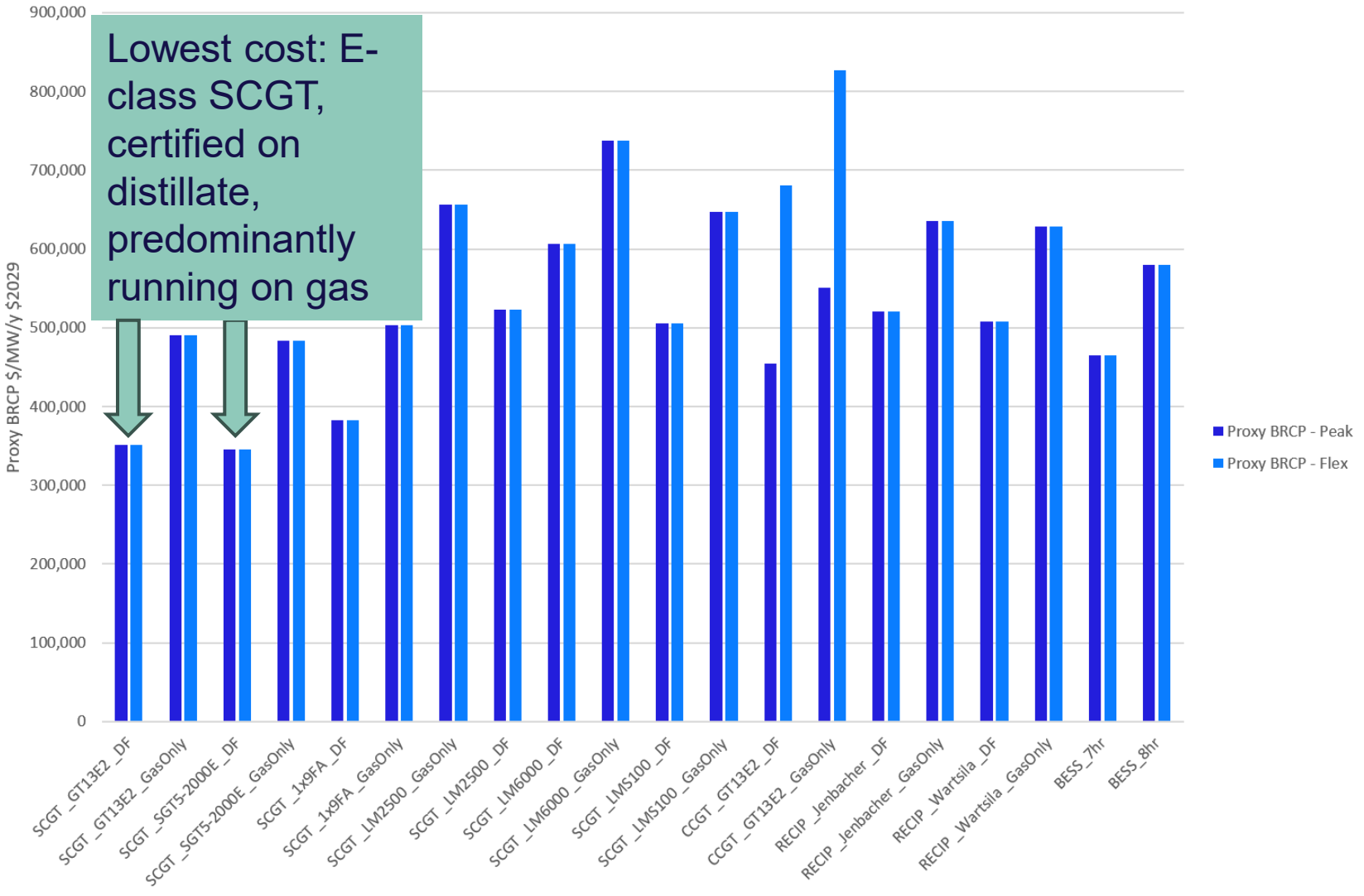
Cost calculation – data and assumptions

- Data sources – Public where possible, with minimal adjustment:
  - CSIRO GenCost
  - Thermoflow where GenCost does not cover a technology configuration
  - BESS: IASR values, with interpolation for 6 and 7-hour storage
  - Rawlinsons is used to make locational adjustments to construction costs
- Values are determined for *notional* new facilities that meet the criteria for Peak and Flex service, and do not represent an expectation of the actual technologies that will or should enter the market in the future.
- Other project parameters, such as lead times are not taken into account in the selection process.
- It is a hypothetical project for commissioning only a few years into the future

Cost calculation – thermal plant options

- Two options are assessed for each Thermal plant configuration:
  - GasOnly
    - Certified on natural gas for RCM purposes, gas fueled with a “fat” lateral (36 in, 15MPa) to provide the necessary 14-hour fuel supply
    - Includes lateral, compressor station and MDQ/DBNGP charges necessary for 14 hours of operation and recharge
  - Dual-Fuel (DF)
    - Certified on distillate for RCM purposes but predominantly running on gas
    - Includes a “skinny” lateral (12-16 in) for primary gas fueling and 36 hours of onsite distillate tankage to satisfy AEMO fuel requirements

Estimated BRCP for candidate configurations



Proposed Benchmark Technology

- E-class SCGT certified on distillate for RCM purposes and predominantly running on natural gas, is the lowest cost Peak and Flex Benchmark Technology.
  - The BRCP cost of the GE (GT13E2) and Siemens (SGT5-2000E) configurations are not significantly different
  - Dual-fuel – 347.8 MW plant with two electrical connections
- The resulting estimated BRCP is $344,893 / MW
- This technology has a 26% lower estimated BRCP than a 7-hr BESS.

Gross/Net CONE

Net/Gross CONE : Criteria

- For Peak BRCP:
  - If the Benchmark Technology would be the marginal energy supplier: gross CONE should be applied
  - If not: further assess whether applying net CONE would be more appropriate.
- For Flexible BRCP:
  - If the Benchmark Technology would be the marginal energy supplier in the intervals Flexible Capacity would be required: gross CONE should be applied
  - If not: further assess whether applying net CONE would be more appropriate.

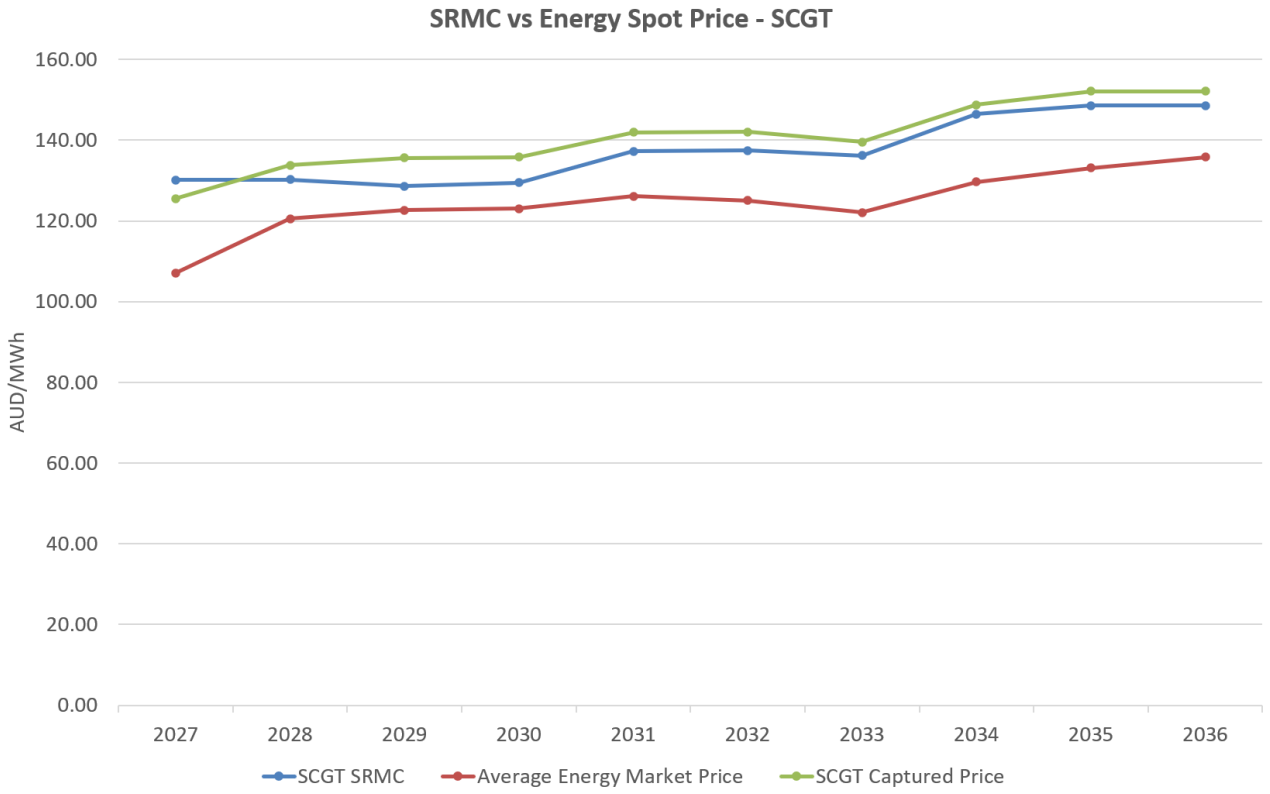
In both cases, the further assessment consists of weighing up the potential advantages and disadvantages of Net and Gross CONE, informed by a forecast of the resulting BRCP values.

Gross/Net CONE– Methodology

- Perform market modelling of the WEM under ESM Rules using RBP's WEMSIM model
- Include a facility representing a unit of the recommended Benchmark Technology – i.e. E-class SCGT (specifically a SGT5-2000E), running entirely on natural gas
  - This represents the best possible case for justifying net CONE, as gas is a lower cost fuel than distillate, so is more likely to receive significant dispatch and net revenue
- The model forecasts:
  - Energy market prices
  - Marginal cost of generation for the SCGT facility
  - Net market revenue for the SCGT facility, including captured prices while generating
  - CONE and Net CONE
- Note that the following results are indicative only

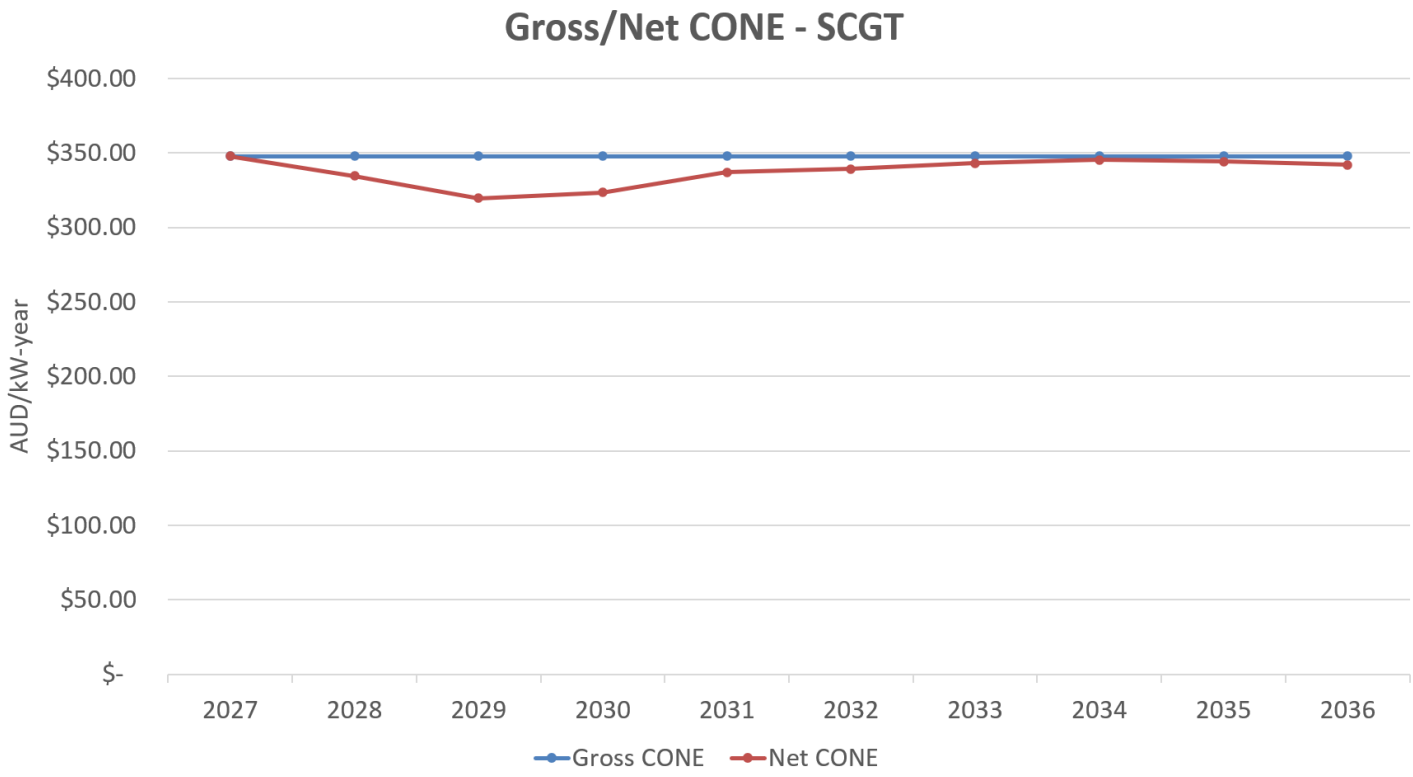
Marginal Energy Supplier – Initial Results

- The SRMC of the SCGT is close to the price captured by the SCGT and is above the average energy market price.
- This indicates that the SCGT is frequently the marginal energy supplier when it is being dispatched.
- Under the first limb of the criteria specified above, this indicates that Gross CONE should be applied



Gross/Net CONE – Initial Results

- The Net CONE of the SCGT is lower that the Gross CONE, but not by a large margin.
- Note that FCESS revenues are not included in this Net CONE calculation – For the Benchmark Technology to be the lowest cost plant for Peak Capacity, the costs to make the facility FCESS capable have not been included in its costs



Gross/Net CONE – Assessment

	Gross CONE	Net CONE
Advantages	• Relatively predictable BRCPs provide investment certainty • More straightforward BRCP determination process • Consistent with current BRCP methodology	• Potentially lower cost to consumers
Disadvantages	• Potentially higher cost to consumers	• Requires forward-looking modelling to forecast net revenues • This is highly sensitive to input assumptions, such as cost changes, other new build, retirements, renewables output, fuel prices, etc. • Consensus will be difficult to achieve • Resulting uncertainty may deter investment, undermining cost savings and reliability

Recommendation: Retain Gross CONE

Gross/Net CONE - Conclusions

- From the above analysis, DEED has drawn the following conclusions:
  - Modelling indicates that it is likely that the Benchmark Technology will be a marginal energy supplier when it is dispatched.
  - While in theory, net CONE may result in lower costs to consumers, the amount of reduction is likely to be very small, even in this scenario in which it is entirely fuelled with natural gas.
  - Implementing net CONE adds significant complexity and uncertainty to the BRCP determination procedure.
  - The resulting uncertainty may deter investment, undermining cost savings and reliability.
- Consequently, DEED proposes to retain a gross CONE approach. This approach was supported by the WICRWG.

Next steps

Next steps

1. Publication of a Consultation Paper
2. Consultation period
3. Final determination

Department of
Energy and Economic Diversification

GOVERNMENT OF WESTERN AUSTRALIA

Thank-you

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Department of Energy and Economic Diversification

Energy Policy WA

WEM Investment Certainty Review (WIC Review) Minutes

Date:	6 August 2026
Time:	9:30 am – 11:30 am
Location:	Microsoft Teams

Attendees	Company	Comment
Dora Guzeleva	(Chair) Energy Policy WA	
Matthew Fairclough	AEMO	Proxy for Mena Gilchrist
Graham Pearson	Australian Energy Council	
Jack Mitchell	Alinta Energy	Proxy for Paul Arias
Jordan Prainito	AuzVolt	
Daniel Kurz	Bluewaters Power 1 Pty Ltd	
Francis Ip	BLT Energy Pty Ltd	
Tom Frood	Bright Energy Investments	
Michelle Gadellaa	Chamber of Minerals and Energy WA	Proxy for Aaron Walker
Jake Flynn	Collgar Renewables	
Liz Aitken	Empire Carbon and Energy	
Richard Cheng	ERA	
Noel Schubert	Expert Consumer Panel	
Luke Skinner	Expert Consumer Panel	
Adam Kiley	Frontier Energy Ltd	
Max Collins	Neoen	
Wayne Trumble	Newmont	
Patrick Peake	Perth Energy	
Paul Arias	Shell Energy	
Shane Cremin	Summit Southern Cross Power Pty Ltd	
Rhiannon Bedola	Synergy	
Ben Tan	Tesla Corp	
Peter Huxtable	Water Corporation	
Mark McKinnon	Western Power	
Lizzie O'Brien	APA Group	
Graeme Ross	Simcoa	

Other attendees	From	Comment
Rohan Zauner	Jacobs	Presenter
Richard Bowmaker	RBP	Presenter
Shelley Worthington	EPWA	
Laura Koziol	EPWA	
Rory Hannon	EPWA	
Apologies	**From**	**Comment**
Mena Gilchrist	AEMO	
Neetika Kapani	AEMO	
Oscar Carlberg	Alinta Energy	
Timothy Edwards	Metro Power	

1. WELCOME

The Chair opened the meeting with an Acknowledgement of Country and welcomed members.

2. MEETING APOLOGIES AND ATTENDANCE

The Chair noted the meeting attendance as listed above.

3. CONFLICTS OF INTEREST AND COMPETITION LAW

The Chair noted the obligations of members under Australian Competition Law.

4. 2026 BENCHMARK TECHNOLOGY REVIEW

The Chair thanked members for views expressed out of session via email and assured members that their views would be reflected in DEED's Consultation Paper on the proposed Determination.

Mr Zauner presented slides 6 – 10, recapping the previous Working Group meeting related to the scope and approach of the review, the proposed configuration shortlist and the cost calculation methodology.

- Mr Tan sought to confirm EPWA's expectation that the indicative 0.55t CO2 / MWh emissions threshold, arising from the WIC Review, won't apply in a timeframe relevant to this review. He asked if this expectation applies just for the upcoming Capacity Cycle or the life of the gas turbines being proposed.

The Chair noted that there is currently no indication that the thresholds will be established or implemented in the legal framework and therefore, DEED cannot take them into account. She added that whether they are implemented in future by government is uncertain.

- Mrs Bedola asked if those configurations certified on gas include fixed transport costs.
- Mr Tan asked what gas transport costs are included for the dual-fuel configurations certified on distillate.

Mr Zauner noted that fixed transport costs have been included for the gas-only configurations by including Dampier to Bunbury Natural Gas Pipeline capacity charges. He clarified that such

a charge is not included in the configurations certified on distillate as this is not necessary for certification.

- Ms Aitken noted that, since the dual-fuel configuration's fuel is distillate for the purposes of certification, during the Peak and Flexible intervals when capacity service is called it runs on distillate, not gas. She enquired if DEED's Consultation Paper could state the emissions intensity assumed for those intervals.

The Chair stated that this was incorrect, with a number of dual-fuel facilities certified on distillate in the WEM frequently running on gas by making their own arrangements for gas supply. She noted that this is a variable cost for these facilities.

- Mr Collins noted that he has prior experience operating a distillate fuelled facility and that, to his knowledge, it needs some form of reservation at the terminal to ensure access to distillate whenever it is needed. He asked if any cost is included for reservation charges or if unlimited access to supply is assumed.

Mr Zauner clarified that distillate storage is included onsite for the dual-fuel configurations, which provides 36 hours worth of fuel, and no additional distillate reservation is assumed.

The Chair noted that existing facilities using this configuration are required to be tested running on distillate twice a year and to demonstrate sufficient storage of distillate for their certification.

- Mrs Bedola noted that the assumption of a gas portfolio that can be used by the distillate certified facility in peak periods may be a challenge going forward with gas supplies tightening.

The Chair noted that if this changes in the future and there are real constraints that impact gas supply, DEED will account for this in any future review.

Mr Zauner presented slides 11 – 13, covering the input assumptions used for estimating the BRCPs for each candidate configuration. He noted that land costs are based on the previous ERA BRCP determination and all locations assessed are within 20km of the DBNGP.

- Mr Frood asked if any allowance has been made for cyber security management costs.

Mr Zauner clarified that no specific allowance has been made for such costs and the Chair confirmed that this hasn't been accounted for previously.

- Mr Trumble asked if the battery configurations are required to secure energy for charging in the same fashion gas and distillate plants are required to secure their fuel.

The Chair confirmed that batteries have a requirement to be available for the Electric Storage Resource Obligations Intervals (ESROI), with refunds being applied if they're not. They have different obligations than other facilities as they are typically able to charge from the grid.

- Ms Aitken noted that locating all configurations within 20km of the DBNGP at 330kV nodes on the Clean Energy Link North suits the thermal plants. She asked if the same location is suitable for batteries.

Mr Zauner replied that batteries would have more flexibility in theory but, in reality, they would be looking at the same 330kV nodes as these are the available unconstrained locations.

- Mr Arias asked if the 'fat lateral' for the gas only configurations is a suitable alternative to firm gas contracts for the purpose of AEMO certification.

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The Chair noted that, as far as she is aware, such facilities already exist and have been certified in the SWIS.

Mr Zauner presented slides 14 & 15, noting that multiple unit configurations are assessed for many of the gas turbines, as this is industry standard in Australia due to favourable projects economics. These plants have two connection points, reducing their maximum contingency.

Mr Zauner presented slide 16, noting that the E-class Simple Cycle Gas Turbines in a dual-fuel configuration, certified on distillate but predominantly operating on natural gas, represent the lowest cost facilities. This is, in part, due to the removal of the indicative 0.55t CO2 / MWh emissions threshold from consideration in this review.

Mr Zauner presented slide 17.

- Mr Frood noted that the fixed operations costs appeared focused on connections and asked if fixed O&M costs should be included as the offer construction guideline doesn't permit those costs.

Mr Zauner clarified that fixed O&M costs have been included in the calculations. He shared his calculations with the group noting that:

- plant FOM is derived from the AEMO Inputs, Assumptions and Scenarios Report
- allowances are also made for
    - transmission asset maintenance
    - gas connection FOM
    - transmission NUOS
    - DBNGP pipeline capacity for the gas only options
    - working capital
    - corporate overheads
    - site security and rates

The Chair, in response to Ms Aitken asking about the impact of NAQ, clarified that DEED is working with Western Power but that an unconstrained location has been identified and so this has informed the current assumption of an unconstrained 330kV node.

- Mrs Bedola noted that she understood the preference for a lower cost technology from a cost perspective but wondered how the change might impact investor confidence.

The Chair noted that cost to customers is a major concern for Government and that it's inappropriate to apply a hypothetical emissions threshold that has not been formalised and derive a higher cost Benchmark Technology.

The Chair, in response to a question from Mr Tan, clarified that AEMO runs NAQ calculations, but it is the Coordinator's responsibility to assess network locations when determining the Benchmark Technology. If there are no unconstrained locations DEED will adjust the calculations accordingly, but an unconstrained location has been identified.

- Ms Aitken asked if this location would be unconstrained in 2029.

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The Chair confirmed that it would be and that the Government is investing in further transmission capacity expansion.

Mr Zauner further clarified that it only needs to be unconstrained in the Peak and Flex Capacity intervals.

- Ms Gadellaa thanked DEED for sharing the technology assessment, noting her support for least cost Reserve Capacity based on current policy. She agreed a different approach could be taken if Government policy changes in the future.

Mr Bowmaker presented slides 18 – 21.

- Mrs Bedola asked why in 2027 the SCGT's Short Run Marginal Cost (SRMC) is above the plants captured price, seeking to clarify if it isn't assumed to run in 2027.

Mr Bowmaker explained that this meant that there were periods when the facility is forced on out-of-merit to provide ancillary services, i.e. it's running despite the fact it's captured price is lower than its costs and it will be made whole by uplift payments during settlement.

- Mrs Bedola sought to clarify if this meant a diesel facility will be running to provide ancillary services, noting this wasn't an outcome the market would want.

Mr Bowmaker noted that:

- the facility is assumed to be running predominantly on gas, while certified on distillate with distillate backup storage onsite
- this plant is an SCGT and so has a lower heat rate
- this is part of the market design, with plants occasionally running out-of-merit to provide ancillary services, but it is desirable to avoid this where possible
    - Mrs Bedola questioned the assumption of such a facility providing FCESS without having locked in gas transport or a firm gas contract.
    - Mrs Bedola further clarified her view that if the facility is running often to provide FCESS it needs a firm gas supply contract which is contrary to the assumptions being made.

The Chair noted that the assumptions are based on current market observations that there are facilities certified on distillate that secure gas through the spot market or through other means, including as part of a portfolio, with these costs captured as variable costs.

The Chair noted that there was an ESM Rule change being progressed that would see these facilities forced to run on distillate if the DBNGP is at stress.

- Mrs Bedola agreed that Synergy's and Alinta's facilities could operate as described due to the size of their gas portfolios but that other operators would struggle to operate in the manner described.
- Mrs Bedola noted that operators are reviewing their costs and how much gas they require given the marginal cost of operating on gas and that she still questioned the viability of a single facility, not one in a larger portfolio, operating in such a way.
- Mrs Bedola noted that as this review is considering a facility for 2029, with the retirements of Collie and Muja power stations, it's unlikely there will be spare gas capacity as Synergy will likely be directing spare gas capacity to Cockburn to operate those units as baseload units.

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The Chair replied that this was Mrs Bedola's assumption but that, equally, the State Government was working under the DomGas policy to ensure there is sufficient gas supply for the market. She noted that this review is conducted under current assumptions and DEED has no reason to assume large gas constraints in 2029.

Mr Bowmaker noted that if the net vs gross CONE modelling was conducted on the assumption that the SGT5-2000E was running partially on distillate, that would produce results even more strongly slanted towards gross CONE. A facility running predominantly on distillate would become one of the most expensive plants in the market, running infrequently and setting the price when it does.

- Mr Cremin agreed that historically plants certified on distillate have often run on gas. However, he noted that, if the emissions threshold has been removed and this review seeks the least cost technology, it seems inconsistent to include the "skinny" lateral for the dual-fuel option as a compulsory cost, as this is a commercial decision.
- Mr Zauner noted that the impact of excluding the cost of the skinny lateral from the dual-fuel option is only 4% of capex, so excluding it will not change the conclusion. It will only slightly lower the cost of the dual-fuel option.
- Mr Collins noted that WACC can be differentiated by emissions intensity as financial institutions are willing to offer lower rates for less emissions intensive technologies. Therefore, it may be worthwhile including the "skinny" lateral, if it means better loan terms can be negotiated.
- Mr Zauner noted that the same WACC is used for all configurations assessed by DEED.
- Following a question by the Chair, Mr Skinner noted that the WACC is an "average" and a single figure has been used to date.
- Mr Schubert noted that the ERA has not varied WACC by emissions intensity in the past.

The Chair responded that she'll check with the ERA.

The Chair noted that she has not observed investor plans for a diesel facility with no dual-fuel capability or no lateral and assumed that companies did not want to be seen to be contributing to emissions.

The Chair noted that the two main positions of this Working Group, retaining the emissions threshold and considering a diesel only plant, were in conflict but both would be included in DEED's Consultation Paper for public feedback.

- Mr Skinner noted that this Working Group has not moved away from considering emissions intensity. It has moved away from a proposal for a threshold but that the SEO requires consideration of emissions.

The Chair noted that the SEO limbs being adequately balanced is a consideration of this review. She noted that reliability and security of supply had been and continues to be the focus of Government but that, more recently, cost to consumers has also become a strong focus. She added that DEED could not recommend a Benchmark Technology that increases BRCP costs without sufficient evidence substantiating the parameters used for the calculation.

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Mr Bowmaker presented slide 22.

- Mr Schubert noted that FCESS revenue is extra revenue for a facility and a cost to the market as well as consumers so it should be included alongside energy revenue. He noted, however, that FCESS revenue for a SCGT is likely to be small due to ESR dominating these markets, and its total cost decreasing substantially due to strong competition from, and between, ESRs.

Mr Bowmaker noted that including FCESS revenues would make little difference to the results on slide 22.

Mr Bowmaker presented slide 23.

- Mr Frood asked if the net CONE analysis of other technologies, BESS for example, would bring the cost assessment results down to similar levels as the SCGT.

Mr Bowmaker explained that:

- A similar analysis was conducted last year when the Benchmark Technology was determined to be a 200 MW / 1200 MWh BESS.
- That analysis found that net revenue for the BESS was lower than that for a SCGT due to the high levels of BESS capacity entering the market and competing against each other.

The Chair noted that conversations around net vs gross CONE have been ongoing through the RCM review and the WIC Review, with stakeholders hesitant to adopt a net CONE approach. She asked members, if based on the analysis, they remained of the same opinion.

- Mr Schubert asked how much revenue the dual-fuel facility is generating when running mainly on gas during the year.

Mr Bowmaker clarified that this modelling assumed it was always running on gas.

- Mr Schubert noted that he agreed with the gross CONE approach, noting the facility's high marginal costs and the simplicity of gross CONE.
- Mr Arias, Mrs Bedola, Mr Flynn, Ms O'Brien and Mr Trumble noted that they support retaining a gross CONE approach.

The Chair summarised that the group had reached a consensus on this point.

5. NEXT STEPS

The Chair presented slide 25, noting that:

- the review was proceeding swiftly to give the ERA sufficient time to review the BRCP WEM Procedure and determine the BRCPs for the 2029/30 Capacity Year.
- DEED and the ERA have been meeting regularly to discuss the review.
- DEED is going to be increasing transparency around the review by providing the cost assessment building blocks, so that stakeholders may inspect the calculations.
- DEED's Consultation Paper will be published soon for a four-week consultation period.

6. GENERAL BUSINESS

The Chair

The meeting closed at 10:58 am

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MARKET ADVISORY COMMITTEE MEETING, 3 September 2026

FOR DISCUSSION

SUBJECT: UPDATE ON AEMO'S WEM PROCEDURES

AGENDA ITEM: 7(A)

1. PURPOSE

Provide a status update on the activities of the AEMO Procedure Change Working Group and AEMO Procedure Change Proposals.

2. AEMO PROCEDURE CHANGE WORKING GROUP (APCWG)

	Most recent meetings	**Next meeting**
Date	20 July 2026	31 August 2026
WEM Procedures for discussion at APCWG	• Network Access Quantity Model • Rule Participant Registration Processes • Dispatch Algorithm Formulation • Consumption Deviation Applications	• Capacity Credit Allocations • Dispatch of Demand Side Programmes • Facility Registration Processes • WEM Submissions • Reserve Capacity Testing (tbc) • Reserve Capacity Security (tbc)

3. AEMO PROCEDURE CHANGE PROPOSALS

The status of AEMO Procedure Change Proposals is described below, current as of 17 August 2026. Changes since the previous MAC meeting are in red text. A procedure change is removed from this report after its commencement has been reported, or a decision has been taken not to proceed with a potential Procedure Change Proposal.

ID	Summary of changes	Status	Next steps	Indicative Date	Required Commence-ment Date
AEPC_2026_06 Network Access Quantity Model	The proposed changes to WEM Procedure: Network Access Quantity Model seek to resolve a potential issue with the methodology in paragraph 4.3 for the determination of the Possible Dispatch Range. Without this precautionary amendment, the methodology could potentially (in some edge cases) affect a reduction to the Network Access Quantity (NAQ) of a Scheduled Facility or a Semi-Scheduled Facility when the (relevant) Facility is not contributing to network congestion. (Note the edge case causing potential issue did not occur in previous cycles).	Consultation closure	Commencement	1 Sep 2026	1 Sep 2026
AEPC_2026_07 Dispatch Algorithm Formulation	AEMO has commenced the Procedure Change Process to propose amendments to the WEM Procedure: Dispatch Algorithm Formulation to reflect changes made to the Dispatch Algorithm in accordance with clause 7.2.3 and to undertake process improvements. Amendments have been made to reflect urgent changes undertaken under clause 7.2.3 to improve the operation of the Dispatch Algorithm, regarding the treatment of Facilities to respect relevant Frequency Co-optimised Essential System Services (FCESS) trapezia and address potential violations of safe limit and defined contingency constraints. Further proposed amendments have been informed by AEMO's operational experience and observed need for uplift to address emergent or potential issues in dispatch. AEMO has proposed the following amendments to the Procedure:	Consultation closure	Commencement	17 Aug 2026	30 Sep 2026

ID	Summary of changes	Status	Next steps	Indicative Date	Required Commence-ment Date
	• updating Constraint Violation Penalties following urgent changes implemented by AEMO in accordance with clause 7.2.3 on 30 October 2025, 5 November 2025, and 4 December 2025. • reducing RoCoF Control Service Requirement fluctuation when both costs of RoCoF and Contingency Raise services are zero. • aligning the schedule of a Non-Scheduled Facility where a negative Unconstrained Injection Forecast has been provided. • improving estimates of a Facility's potential Droop Response in the Essential System Service pre-processing calculation. • aligning the Procedure with current system functionality, with respect to relaxation of Enablement Limits for RoCoF Control Service in Pre-Dispatch Intervals in the Pre-Dispatch Schedule and Week-Ahead Schedule.				
AEPC_2026_08 Rule Participant Registration Processes	AEMO has commenced the Procedure Change Process to propose amendments to the WEM Procedure: Rule Participant Registration Processes to undertake improvements to the application processes.	Consultation closed	Commencement	3 Sep 2026	N/A
AEPC_2026_09 Dispatch of Demand Side Programmes	AEMO has commenced the Procedure Change Process to propose amendments to the WEM Procedure: Dispatch of Demand Side Programmes as a result of updates to the ESM Rules as a result of the Reserve Capacity Mechanism Review.	Consultation	Consultation closes	10 Sep 2026	1 Oct 2026

ID	Summary of changes	Status	Next steps	Indicative Date	Required Commence-ment Date
	AEMO has proposed the following amendments to the Procedure to ensure consistency with the Amending Rules: • Updates to the process for determining dispatch of DSPs about how AEMO creates a DSP Dispatch Merit Order and determines whether a Demand Side Programme will be included. • Creating new defined terms 'DSP Dispatch Merit Order' and Eligible Demand Side Programme' to support implementation of the changes.				
AEPC_2026_10 Consumption Deviation Applications and Demand Excluded Days	AEMO has commenced the Procedure Change Process to propose amendments to the WEM Procedure: Consumption Deviation Applications and Relevant Demand Excluded Days as a result of amendments that have been made to the ESM Rules through the Electricity System and Market Amendment (Tranche 9) Rules 2025, Schedule 3. The proposed amendments arose by identifying the need to account for events such as maintenance or network outages affecting Relevant Demand that could lead to unintended consequences, such as the disincentive to participate in a DSP and / or the disincentive for a Market Participant to follow a Dispatch Instruction for a DSP. The amendments include: • Demand Side Programmes will no longer make Consumption Deviation Applications. • Demand Side Programmes may submit a request to exclude a day it deems to be non-representative of its usual operation for the purpose of determining the Selected Days for Relevant Demand.	Consultation closure	Commencement	1 Oct 2026	1 Oct 2026

ID	Summary of changes	Status	Next steps	Indicative Date	Required Commence-ment Date
AEPC_2026_11 Capacity Credit Allocations	AEMO has commenced the Procedure Change Process to propose amendments to the WEM Procedure: Capacity Credit Allocation as a result of updates to the ESM Rules as a result of the Reserve Capacity Mechanism Review. AEMO has proposed the following amendments to the Procedure to ensure consistency with the Amending Rules: • Addition of further information on capacity credit allocation process. • Addition of peak and updates to the equation for where AEMO approves and rejects capacity credit allocation. • Addition of information on withdrawing capacity credit allocation submissions to align with updates to the ESM Rules. • Changes to the section regarding amendments to capacity credit allocations to provide information about how AEMO identifies Peak Capacity Credit Allocations including updates to the relevant equation. • General updates to the template and Procedure to improve readability and alignment with ESM Rules.	Consultation	Consultation closes	7 Sep 2026	1 Oct 2026
AEPC_2026_12 Facility Registration Processes	Due to the inclusion of significant additional scope, AEMO proposes to replace the WEM Procedure: Facility Registration, De-Registration and Transfer with the WEM Procedure: Facility Registration Processes. The proposed new procedure includes the following additional scope:	Consultation	Consultation closes	14 Sep 2026	1 Oct 2023

ID	Summary of changes	Status	Next steps	Indicative Date	Required Commence-ment Date
	• Registration of Separate Facilities. • Granting and revoking exemptions from Facility registration. • Requesting further information from an exempted Facility. • Transferring Candidate Facilities between Rule Participants. • Transferring Associated Loads between Demand Side Programmes of the same Market Participant. • Applying for, and cancelling, Intermittent Load status. • Providing information on protection schemes. • Facility Class reassessments (both voluntary and involuntary). • Processes for determining a Facility Class. • Circumstances in which AEMO would require a Facility less than 5 MW in size to register. • Communication requirements regarding registration activities. • Processes for requesting further information from applicants, and processes for applicants to request additional time to provide information regarding registration-based applications and reassessments. • Processes for consulting with the Network Operator regarding registration-based applications and reassessments.				

ID	Summary of changes	Status	Next steps	Indicative Date	Required Commence-ment Date
AEPC_2026_13 WEM Submissions	AEMO has commenced the Procedure Change Process to propose amendments to the WEM Procedure: WEM Submissions as a result of amendments that have been made to the ESM Rules through the Wholesale Electricity Market Amendment (RCM Reviews Sequencing) Rules 2025. The proposed amendments were evaluated through broad consultation packages including the RCM Review reforms and the Demand Side Response review. These reforms were intended to facilitate the participation by DSP's that are aggregations of smaller loads or distributed energy resources. The removal of 'Withdrawal' from clauses 7.4A.12, 7.4A.20 and 7.4A.24 was to support the broader treatment of a Demand Side Programme as being capable of representing either demand (withdrawal), or export (injection). The amendments include: • Process explanations are clarified. • The RTM Submission Schema and the DSP Submission Schema will be incorporated in this Procedure in Appendix B. • The term 'Withdrawal' is removed from this Procedure.	Consultation	Consultation closes	11 Sep 2026	1 Oct 2026

4. INDICATIVE SCHEDULE OF AEMO PROCEDURE CHANGE PROPOSALS

AEMO has prepared an indicative schedule of its Procedure Change Proposals expected to commence shortly. Changes since the previous MAC meeting are in red text. Procedure Change Proposals that have commenced since the previous MAC meeting have been moved from Table 4 into Table 3 above. While every effort has been made to ensure the quality of the information contained in the indicative schedule, the content (including timeframes) may be subject to change (e.g. due to availability of staffing resources, unforeseen competing priorities etc).

WEM Procedure	Summary of changes	Status	Next steps	Indicative date of next step	Required Commence-ment Date
WEM Procedure: MT PASA	AEMO will be initiating this Procedure Change Proposal to update the WEM Procedure arising from WEM Reform. This WEM Procedure outlines the information AEMO requires and the process it will follow in conducting the Medium-Term Projected Assessment of System Adequacy.	Delayed	Consultation	TBD	1 Oct 2023
WEM Procedure: Forecast Unscheduled Operational Demand	AEMO will be initiating this Procedure Change Proposal to accommodate the amendments to the ESM Rules from WEM Reform. This new WEM Procedure documents how AEMO will prepare the Forecast Unscheduled Operational Demand.	Drafting in progress	Consultation	Sep 2026	1 Oct 2023
WEM Procedure: Reserve Capacity Testing	AEMO will be initiating this Procedure Change Proposal to accommodate amendments to the ESM Rules from the RCM Review and Tranche 9 changes. Updates will be made to the process for DSP testing and re-testing, and it will clarify the consequences on a DSP or NGIS for failing a test or re-test (respectively).	Drafting in progress	Consultation	Aug 2026	1 Oct 2026
WEM Procedure: Reserve Capacity Security	AEMO will be initiating this Procedure Change Proposal to accommodate the amendments to the ESM Rules from the RCM Review and Tranche 9 changes. Updates will be made to reflect the changes to DSP testing and to clarify the arrangements for drawing on RC security and assessment for Commercial Operation.	Drafting in progress	Consultation	Aug 2026	1 Oct 2026
WEM Procedure: Dispatch Compliance	AEMO will be initiating this Procedure Change Proposal to accommodate changes to sub-clauses 2.13.7(b) and 4.11.1(c)(v), which commence on 1 October 2026. The changes require AEMO to monitor Market Participant compliance with clause 7.10.6B and document how it intends to do so in a WEM Procedure. Where a Market Participant does not comply with clause 7.10.6B, from 1 October 2026, changes to sub-clause 4.11.1(c)(v) prohibits AEMO from assigning Certified Reserve Capacity to the relevant Facility.	Drafting in progress	Consultation	TBC	1 Oct 2026

WEM Procedure: Commissioning Tests	AEMO will be initiating this Procedure Change Proposal to update the process AEMO uses to assess a Commissioning Test Plan (CTP). The changes will enable AEMO to seek advice from the Network Operator on whether the Network Operator endorses a Commissioning Test Plan, to inform AEMO's assessment of whether to approve or reject a CTP or a revised CTP against the (relevant) risk factors.	Drafting in progress	Consultation	Sep 2026	1 Nov 2026

Department of Energy and Economic Diversification
GOVERNMENT OF WESTERN AUSTRALIA

Energy Policy WA

Agenda Item 7(c): Update on the Wholesale Electricity Market (WEM) Investment Certainty Review

Market Advisory Committee (MAC) Meeting 2026_09_03

1. Purpose

The Chair of the WEM Investment Certainty (WIC) Review Working Group (the Working Group) to provide an update on the WIC Review.

2. Recommendation

That the MAC notes that:

- Working Group meetings were held on 25 June, 23 July and 20 August 2026; and
- provides any additional comments/views where requested in the summary slides (Attachment 1).

3. Background

The Coordinator of Energy (Coordinator) is conducting the WIC Review, in consultation with the MAC, under clause 2.2D.1 of the Electricity System and Market (ESM) Rules.

The MAC established the Working Group to support the WIC Review. The Terms of Reference, papers and minutes for all Working Group meetings are available here. Further information on the Review, including the Scope of Work is available here.

The WIC Review includes a package of WEM reform initiatives aimed at ensuring that the WEM and the ESM Rules provide sufficient incentives for new renewable generation capacity, while maintaining system security and reliability, and without unduly increasing the cost to consumers. Consultation with stakeholders on Initiatives 1 and 2 of the WIC Review concluded in late 2024.

4. Consultation

The Review is now examining options for a Renewable Energy Mechanism (the Mechanism) to provide investment certainty to new renewable energy projects following concerns from potential investors.

Over the course of the three meetings, the Working Group refined the “problem statement” the Mechanism is aimed at addressing and considered options that could reasonably be implemented by December 2027 including:

1. A 10-year fixed Reserve Capacity Price (RCP);
2. Voluntary secondary market;
3. A renewable Benchmark Reserve Capacity Price (BRCP);
4. A minimum energy price for renewables; and
5. Renewable fuel contracts for storage facilities (added following Working Group feedback)

10 Year fixed RCP for renewables (option 1)

This option allows renewable generators to opt for a fixed RCP for ten years from the date of entry rather than the floating price which changes each year. This approach alone would not be sufficient to ensure revenue certainty for new renewable generation projects and will not be progressed.

Voluntary secondary market (option 2)

The small size of the WEM and the dominance of Synergy meant that that a voluntary secondary market would be unlikely to close the gap, although there was support for greater transparency of contract pricing, and this option will not be progressed at this stage.

A renewable BRCP (option 3)

Recovering costs on the basis of an Individual Reserve Capacity Requirement and contribution to peak, targeted certain customers over others and the cost resulting from a renewables-based BRCP approach may be high, and this option will not be progressed further.

Renewable fuel contracts for storage facilities (option 5)

This option extends the 10-year fixed RCP to storage when contracting with new renewable generation. However, requiring only new Electric Storage Resources (ESR) to show evidence of renewable supply would not support the volume of new generation required to replace retiring facilities. Additionally, it is inappropriate to apply retrospective eligibility requirements to existing ESRs and this option will not be progressed.

Guaranteed minimum energy price for renewables (option 4)

Under this option the Coordinator would determine a generation weighted average target capture price for renewable generation, based on the most efficient new entrant, with costs recovered from the rest of the market. To maintain diversity in new entrant generation, there would need to be different target capture prices for solar and wind facilities.

Market frameworks must enable efficient entry and exit of participants, to facilitate competition and put a downward pressure on the long-term cost of electricity to consumers:

- If an eligible facility's average Real-Time Market price for the year is less than this minimum price, it would be paid a top up to ensure it receives, on average, the minimum price. This means, however, that the Real-Time Market prices are declining, i.e. that customers are paying less for energy.
- If, however, the average Real-Time Market price for the year is more than the minimum price, the eligible facilities would not be paid a top up. Therefore, there will be no cost to the rest of the market from the operation of the Mechanism.

Working Group members suggested that:

- advice should be sought from the Clean Energy Finance Corporation on what financing conditions could inform setting the target price;
- a target for renewable energy generation (not capacity), which the mechanism can use to set the number of eligible facilities, would help avoid inefficient overbuild;
- a time limit is required to make clear the mechanism is "transitional" and not ongoing; and
- if it becomes apparent that there is no need to incentivise additional projects, there may be a need to pause the Mechanism in some years, but this must be done in advance to avoid adding additional uncertainty.

At the 20 August 2026 meeting discussion focused on eligibility and design principals of appropriate cost allocation which included the following:

- The revised approach to recover costs from consumers and non-renewable facilities using a formula similar to the Market Fee calculation, which sums the absolute values of injections and withdrawals in each Trading Interval.
- That further consideration is required on the length of the support duration and whether a MWh target is required for this programme specifically, or a general trajectory for renewable generation to reach net carbon zero by 2050.
- How the Mechanism may interact with the National Greenhouse and Energy Reporting Scheme and whether there may be any inadvertent impacts to the behaviour of participants in the market.
- If cost recovery increases costs for generators, these are likely to be passed through to consumers. How this interacts with the ERA Offer Construction Guideline requires consideration.
- Trade-offs between simplicity and accuracy and minimising any changes for AEMO when it comes to implementation.

5. Next Steps

An additional Working Group meeting is scheduled 24 September 2026 to assess impact of the Mechanism under different market conditions. Following this work will begin on the Consultation Paper, which will also incorporate additional options not progressed, but included in the context of a future long-term scheme, should one be required.

Attachment

Agenda Item 7(c) – Attachment 1 – WIC Review Working Group – Summary Slides

Department of
Energy and Economic Diversification

GOVERNMENT OF WESTERN AUSTRALIA

Update on WIC Working Group

Market Advisory Committee

3 September 2026

Contents

No.	Item	Duration
1	Objective	Not presented
2	Initial options assessment	5 min
3	Eligibility for participation	5 min
4	10 year fixed capacity price for renewables	Not presented
5	Fuel contracts for storage facilities	Not presented
6	Minimum average energy price for renewables: payments	15 min
7	Minimum average energy price for renewables: cost recovery	15 min
8	Next steps	5 min

Objective

The WEM needs a mechanism to increase confidence in renewable financing (1)

Storage capacity continues to grow in the SWIS. As load grows and fossil fueled facilities retire, significant volumes of renewable energy will be needed to fill the storage and meet annual demand.

Renewable projects are not bankable without confidence in future revenues. Currently, this can come from capacity payments, Power Purchase Agreements (PPAs), or real time energy market payments. However:

- Capacity payments are not sufficient to cover the fixed cost of renewables,
- Real-time energy market prices will decrease as renewable penetration increases.
- Market customers appear unwilling to agree contracts at a higher cost than projected Real-Time Market prices after renewable entry.

Figure 1 Forecast supply-demand balance of forecast peak capacity, *Expected* and *High* scenarios, 2026-27 to 2035-36 (MW)

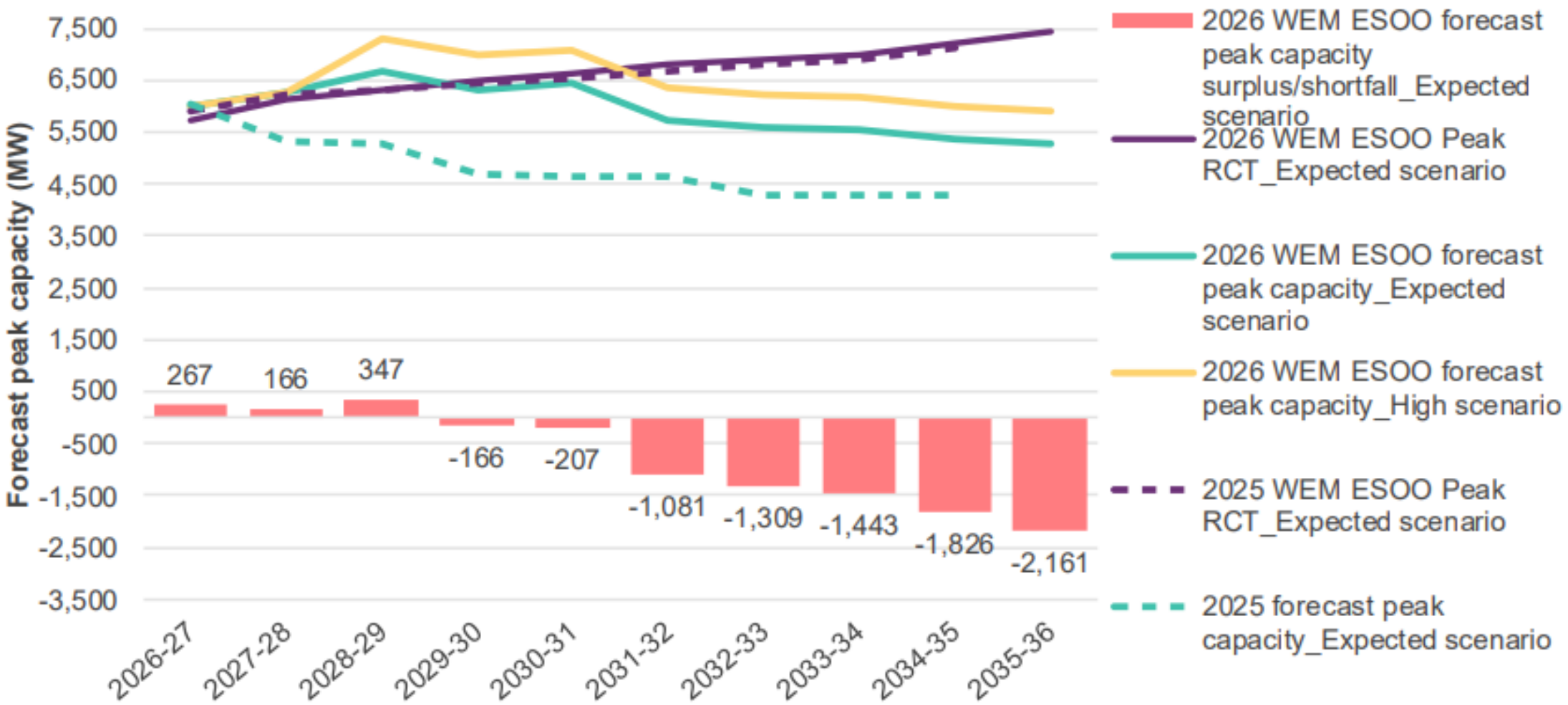
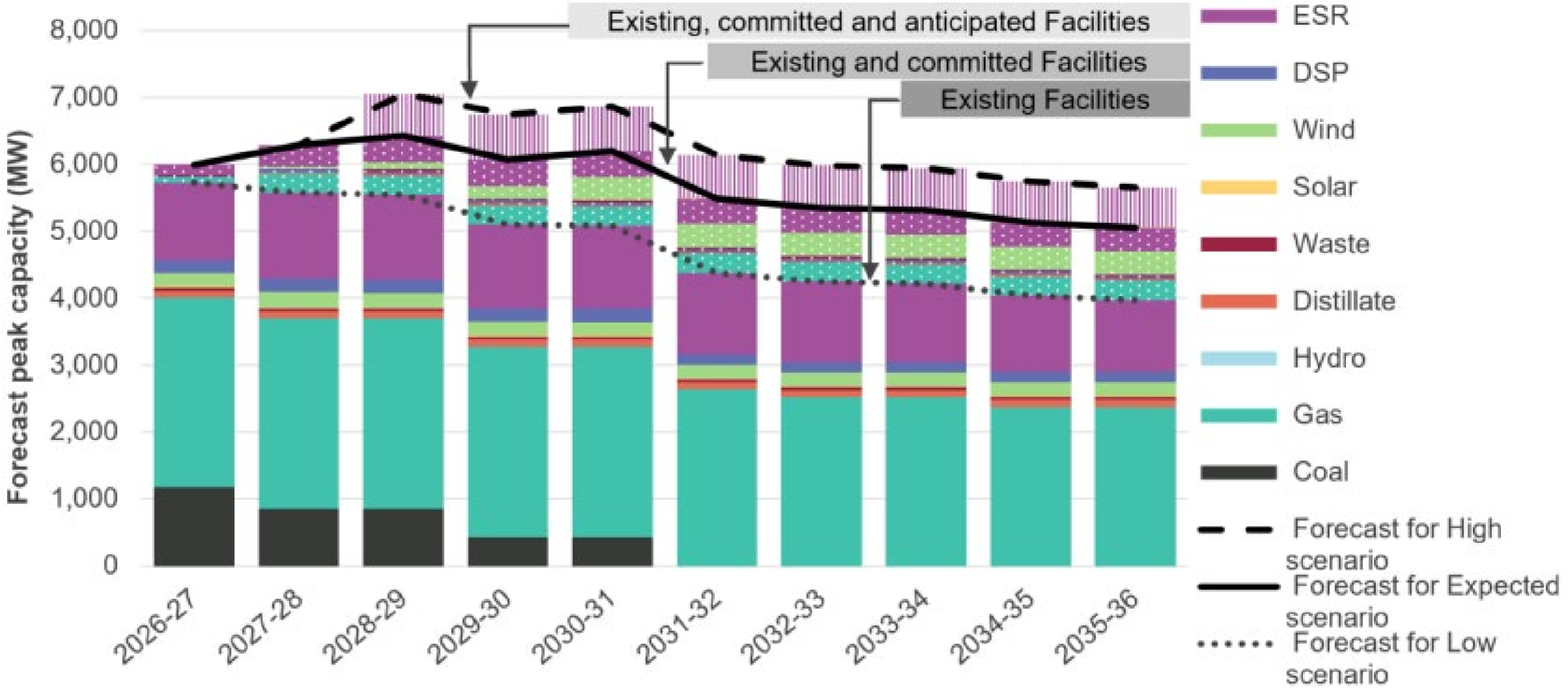


Figure 22 Forecast peak capacity by technology type, under three scenarios, 2026-27 to 2035-36 (MW)



The WEM needs a mechanism to increase confidence in renewable financing (2)

- There is currently a gap between what developers are willing to sell for and what customers are willing to pay, and significant risk that the gap will not close in time to avoid energy shortfalls.
- Additionally, the NEM is developing an Electricity Services Entry Mechanism and the WEM needs its own mechanism to stay competitive.
- This Renewable Energy Mechanism (the Mechanism) is intended to address this risk, by providing revenue confidence to renewable projects whose output is needed, but is not covered by an existing PPA at the time the Mechanism is implemented.
- This Mechanism is intended to apply to generation facilities entering from 2030, providing the minimum support required to reach Final Investment Decision (FID).

Working Group discussion of project objective

As a result of Working Group feedback, the problem statement was reviewed and adjusted to:

- take into account any learnings from the process in the NEM and to ensure that it is fit for purpose for WA, as while the WEM and the NEM have the same underlying issues, they manifest slightly differently; and
- make explicit mention of energy used to charge storage.

The group discussed the need for both short term and long term solutions. While the scope for this particular Mechanism is to cover the period to 2035, discussion of potential longer-term solutions will be included in the Consultation Paper.

Do MAC members have any comments on the objective/problem description?

Initial options assessment

Options longlist

1. Renewable Electricity Certificates
2. Revenue guarantee scheme (CIS-like)
3. Renewables based-BRCP
4. 10 Year fixed RCP
5. Contracts for Differences
6. Electricity Services Entry Mechanism
7. Voluntary secondary market
8. Guaranteed minimum energy price for renewables
9. Renewable fuel contracts for storage facilities

Options longlist

Out of the nine options identified, five could reasonably be implemented by December 2027.

Two options would enhance revenue confidence but not be sufficient on their own:

- 10-year fixed RCP
- Voluntary secondary market

Each of the other three options could be sufficient to provide revenue confidence by itself:

- Renewable BRCP
- Minimum energy price for renewables
- Renewable fuel contracts for storage facilities (added due to working group feedback)

After discussing with the working group, DEED determined that a renewables-based BRCP and a voluntary secondary market would not be progressed further.

	Feasible by 2027?	Working group shortlist
Purchaser obligation	No	
Revenue Guarantee Scheme (CIS-like)	No	
Renewables based BRCP	**Yes**	No
10 year fixed RCP	**Yes**	**Yes**
Contracts for Differences	No	
Electricity Services Entry Mechanism	No	
Voluntary secondary market	**Yes**	No
Guaranteed minimum energy price for renewables	**Yes**	**Yes**
Renewable fuel contracts for storage facilities	**Yes**	**Yes**

Feedback on high level options

- Some members agreed that a Mechanism to provide revenue confidence for renewable investors is needed, others were not convinced that there would be missing generation without a mechanism. This was subsequently discussed at the 23 July meeting when the working group agreed that a Mechanism is required and there is a need to understand the projected generation adequacy gap.
- There was no support for an approach using a separate BRCP for renewable facilities, and DEED has suspended design work on this option.
- Members would like to see greater transparency of contract pricing, but there was little support for establishing a voluntary trading platform, as members considered this market would be illiquid. DEED will consider other ways to increase transparency of contract prices, but not as part of this project.
- Members supported progressing the development of a minimum average price guarantee for new renewable generators.
- The group was not convinced the Mechanism needs to directly incentivise the time that energy is produced. If enough storage is present, then the need is for energy, not firming. Also, incentivising evening generation from renewables could drive more volatility in periods of system stress.

Shortlisted options that can fully achieve the objective

Guaranteed minimum energy price for renewables

The Coordinator determines a minimum $/MWh price for renewables, based on the value of energy and cost reduction contribution of renewable generation, in recognition of low reserve capacity revenue.

Implemented through the ESM Rules

Costs recovered from all Market Participants

Renewable fuel contracts for storage facilities

Storage facilities must show contracts for energy supply from renewable facilities in order to receive certified reserve capacity.

Implemented through the ESM Rules

Costs recovered from storage providers

Shortlisted option that can partially achieve the objective

10 Year fixed Reserve Capacity Price

Renewable generators can opt for a fixed Reserve Capacity Price for ten years from the date of entry, rather than a floating price which changes each year.

Implemented through the ESM Rules.

Costs recovered from Market Customers, as for other capacity costs

Do MAC members agree that the shortlisted options are the most promising?

Eligibility for participation

Which projects need support?

The mechanism provides ongoing revenue support to give confidence to financiers.

- Existing renewable generation does not need support, as a positive investment decision was made before it was built.
- If a developer can agree a long-term PPA for energy offtake from a new facility, it does not need additional support.
- A gentailer developing a new project to meet its own load does not need support, as it can deliver projects to match the forecast supply to customers – a natural hedge.

Projects which first receive Capacity Credits in the 2026 Reserve Capacity Cycle have clearly reached financial close without needing additional support.

Identifying projects in the latter two categories is not straightforward. It would require significant new processes for participants to submit contract information to AEMO, either for use in determining eligibility in the first place, or for use in settlement to exclude contracted volumes.

What projects will have to prove to be eligible

The Mechanism is not guaranteed for all new entrants for all time.

A project will be eligible if it:

- is fuelled by a renewable source;
- reaches committed status *after* the date of publication of the final Information Paper. This avoids developers delaying investment decisions until the Mechanism starts;
- receives Capacity Credits for the first time in an eligible Reserve Capacity Cycle.

The 2026 and 2027 capacity cycles will not be eligible capacity cycles.

The Mechanism may not be required in every year, and it may not be continued after the first 5 years. For example, significant investment in one year may obviate the need to provide support generators entering the following year. Alternatively, a new Commonwealth programme may supersede the need for a WA Mechanism.

What projects will not have to prove to be eligible

Eligibility criteria will not include:

- Presence or absence of a PPA for offtake
- Proof of ability to deliver promised generation
- Operation date
- Location at an uncongested network location
- Firming of output

These criteria are not required, because:

- parties will be free to agree how support payments are managed in their off-market billing and payments, just as they do for variable contracts. The Mechanism will be in place far enough in advance for parties to negotiate offtake contracts to account for potential top-up payments.
- participants are incentivised to maximise their output. They can receive more revenue by being firmed, commissioned early, and at an uncongested location. If a project somehow stacks up commercially at a congested location, then it can still receive support.

Do MAC members have any comments on eligibility criteria?

10 year fixed Reserve Capacity Price for renewables

10-year Fixed Reserve Capacity Price (RCP)

The fixed facility RCP allows generators to secure a fixed price for the Capacity Credits assigned to them.

Currently, only renewably fuelled facilities in Capability Classes 1 and 2 are eligible for a 10-year fixed price.

This option would allow renewable facilities in class 3 to have a 10-year fixed RCP, calculated according to clause 4.29.1D of the ESM Rules, where:

- The price applicable for a renewable generator will be fixed at the RCP for the first Capacity Year that the facility receives Capacity Credits.
- The fixed price would be adjusted for the CPI for the succeeding nine Capacity Years.

This option affects the facility revenue through capacity payments.

This option would only require minor rule changes that would allow renewable generators to be eligible for 10-year fixed RCP.

This approach alone would not be sufficient to ensure revenue certainty for new renewable generation projects.

Initial assessment – 10-year fixed RCP

Assessment criteria		Reason
Deliverability	✓	This option requires minor rule amendments
Sustainability	✓	This option is feasible for an indefinite period
Revenue Certainty	×	A 10-year fixed RCP provides some confidence in future revenues, but does not guarantee sufficient revenue to cover long run costs
Minimise Cost	-	A fixed RCP could potentially increase or decrease the overall cost to customers, depending on the future capacity price trajectory
Minimise Risks	✓	Consumers could be exposed to paying a higher RCP for longer than otherwise, but the cost is based on the actual capacity prices in particular years
Allocate costs appropriately	✓	Costs are borne by market customers in proportion to their Individual Reserve Capacity Requirement (IRCR) and Capacity Credit position
Competitive outcome	✓	The option is open to all new developments
Reduce taxpayer exposure	✓	Costs are borne by capacity purchasers
Incentive to produce	✓	Generators retain exposure to RTM prices
Minimise impact on market	✓	No impact on RTM dynamics

Fuel contracts for storage facilities

Fuel contracts for storage facilities (1)

The goal of this project is to avoid a future where we have a lot of energy storage, but no generation to fill it with, or use non-renewable generation to do so.

Currently, Capability Class 1 Facilities (dispatchable with no energy limitations) are required to provide evidence of fuel supply in order to be allocated certified reserve capacity (CRC). Energy Storage Resources (ESRs) are not required to provide evidence of agreements to purchase energy to charge with, but if they do, can opt for a ten year fixed Reserve Capacity Price.

If ESRs were required to provide evidence of supply from new renewable facilities in order to receive CRC, the counterpart renewable facilities would have a contracted revenue stream to help reach financial close, without requiring a new mechanism to be designed and implemented.

Fuel contracts for storage facilities (2)

DEED considers this option is not practical:

- While more ESR is expected to enter the WEM in the next few years, the anticipated capacity is less than what has already been committed. Requiring only new ESR to show evidence of renewable supply would not support the volume of new generation required to replace retiring facilities.
- It would be inappropriate to apply additional CRC eligibility requirements to existing ESRs. These facilities are already protected from known changes to eligibility requirements such as storage duration. Retroactively changing the CRC requirements would invalidate the investment business case on which they were built.

Initial assessment – Fuel contracts for storage

Assessment criteria		Reason
Deliverability	✓	This option requires minor rule amendments
Sustainability	✓	This option is feasible for an indefinite period
Revenue Certainty	×	There is insufficient new ESR capacity to cover the volume of renewable generation required.
Minimise Cost	✓	This option would provide an efficient cost to consumers.
Minimise Risks	✓	This option would be unlikely to result in cost blow-outs.
Allocate costs appropriately	✓	This option would see costs borne by consumers of storage output
Competitive outcome	×	New storage facilities would be at a disadvantage compared to existing ones
Reduce taxpayer exposure	✓	Costs are borne by market participants.
Incentive to produce	✓	Assuming the contract is structured as a $/MWh payment, renewable generators retain incentive to produce as much as they can.
Minimise impact on market	-	ESR facilities pay contract prices for their charging rather than being fully exposed to the RTM. This could change the way they offer.

Minimum average energy price for renewables

Payments

Minimum Energy Price for Renewables

- Under this approach, renewable generators would receive a guaranteed minimum average price for their energy.
- The Coordinator would determine a generation weighted average target capture price for renewable generation, based on the most efficient new entrant.
- If an eligible facility's average Real-Time Market price for the year is less than the target capture price, it would be paid a top up to ensure it receives, on average, the target capture price.
- Costs would be recovered through market settlement.

Treatment of different technologies

Wind facilities have higher capital costs than solar facilities, but receive a higher proportion of Capacity Credits to nameplate capacity, as they are more likely to be generating during periods of system stress.

If the target capture price is set only using the lowest cost technology, diversity of generation sources in the SWIS will decline. To maintain diversity in new entrant generation, there would need to be different target capture prices for solar and wind facilities.

Risk sharing

- A minimum energy price exposes the facility to Real-Time Market price changes. It has incentive to generate as much as possible when it can, when the price is positive. When the price is negative, it is not protected by the price floor and is incentivised to curtail by market price signals.
- With only a floor, consumers bear downside risk, but do not share in potential upside if prices are high. In markets with extremely high market price caps, this upside potential can be significant. In the WEM, the maximum Real-Time Market price is already limited, to recognise that there is a capacity mechanism, so there is less potential for significant upside from high prices.
- Because payments are restricted to actual energy output, outside bilateral contracts, consumer exposure is limited, even if entry is higher than expected.

Initial assessment – minimum energy price

Assessment criteria		Reason
Deliverability	✓	This Mechanism would require new settlement calculations for payments and cost recovery
Sustainability	-	This Mechanism would need to be reviewed after three to five years of operation
Revenue Certainty	✓	A guaranteed minimum average price for energy output provides confidence in revenue from generation for participants that are confident in their expected level of curtailment. Certainty for individual projects is provided through their ability to lock in the minimum price for 10 years.
Minimise Cost	✓	If the target price is based on the most efficient new renewable generator, costs can be minimised
Minimise Risks	✓	Whatever the price, customer exposure is limited to the volume of energy actually generated
Allocate costs appropriately	-	Depending on the modelling outcomes, allocating costs via Market Fees may need to be assessed further. An alternative cost allocation method is likely to be complex and increase implementation costs and time
Competitive outcome	✓	Market outcomes remain based on competitive pressure
Reduce taxpayer exposure	✓	Market Participants pay costs on behalf of electricity users
Incentive to produce	✓	Generators remain exposed to RTM prices, and are incentivised to generate when the market price is above zero
Minimise impact on market	✓	No impact on RTM dynamics

Working Group discussion

- A minimum price guarantee does not need to cover all capital costs, as when securing finance the duration of the revenue can be just as important as the level of the payment. It needs to cover likely debt costs, but does not need to fully cover equity returns. DEED should seek input from the Clean Energy Finance Corporation on what financing conditions could inform setting the target price.
- While renewable projects can currently be built and operating within 2 years of final investment decision, trying to deliver a large quantity of renewable generation in a short period of time may result in shortages of equipment, skilled people, and other resources, requiring longer lead times for project delivery.
- Members would like to see a target for renewable energy generation (not capacity), which the Mechanism can use to set the number of eligible facilities. This would help avoid inefficient overbuild.
- If there is to be no support for renewable generators in a particular year, this must be known well in advance, in time to inform investment decisions for that year.

Do MAC members have any other comments on this approach to renewable support?

Variations identified by the Working Group (1)

Minimum price only for peak energy delivery

- This option would incentivise energy available in the evening (when needed) rather than in the middle of the day.
- This variation will be included in the Consultation Paper.

Extended minimum price guarantee

- This option would apply a minimum average price to all facilities, not just renewables.
- Applying a minimum average price for facilities with non-zero fuel cost is likely to increase both complexity and overall costs to consumers, and runs contrary to WA's goal of reaching net carbon zero by 2050.
- This option is not being further explored.

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Variations identified by the Working Group (2)

Minimum price with auction for ceiling

- This option would add to the proposed minimum price option, with eligibility assigned based on an auction for the ceiling above which revenue is shared with consumers
- Designing and implementing an auction is complex and time consuming. If an auction could be designed in the required timeframe, it would be more effective to implement a regular Contracts for Differences auction.
- This option will be included in the consultation paper in the context of a future long term scheme.

Minimum average energy price for renewables

Cost recovery

Cost recovery via Market Fees

DEED's initial proposal was to recover the costs of any top-up payments through Market Fees, as it would allow simple settlement calculations.

Market Fees are recovered from both sellers and purchasers of energy, based on the absolute value of their injections and withdrawals. Market Fees apply to all energy, whether transacted under bilateral contracts, STEM, or RTM.

Working group participants identified that:

- if all customers pay for the top up to the minimum average price, customers who have signed PPAs with renewable generation could end up paying twice
- Renewable generators would also pay a portion of the top up payments.

This is not aligned with the design principle of appropriate cost allocation. While it is relatively simple to exclude renewable generators from cost recovery, it is much harder to exclude renewable energy under contracts with customers.

Cost recovery: proposal

All renewable facilities commissioned after the relevant date will be eligible for top-up payments, regardless of contract status. This includes hybrid renewable/storage facilities.

Customers contracting for renewable offtake will account for top up payments when negotiating contracts and in off-market billing and payment processes

Costs of top-up payments will be recovered from consumers and non-renewable facilities using a formula similar to the Market Fee calculation, which sums the absolute values of injections and withdrawals in each Trading Interval.

Costs will be recovered based on year-to-date consumption.

Working Group discussion (1)

- DEED still needs to consider the support duration – likely to be either 10 or 15 years.
- Need clarity on whether we have a MWh target for this programme specifically, or a general trajectory for renewable generation to reach net carbon zero by 2050.
- We may need an option for proponents to give a minimum facility size, and to exclude them if the portion of the facility eligible for the minimum price is less than that.
- AEMO noted that settlement does not currently have information on which facilities are renewable or not. This would need to be added.
- How does this mechanism interact with NGERS – can contributions to support payments be counted as renewable supply?

Working Group discussion (2)

- If this increases effective variable costs for generators, they will seek to pass it through to consumers. How this interacts with ERA offer construction guideline needs to be considered.
- Recovering costs only from the consumer side would remove the need to adjust contracts and consider support contributions in generator offer construction and non-renewable generation PPAs. On the other hand:
  - including generators in cost recovery means the cost is spread over all energy participants, and
  - including non-renewable generators in cost recovery means the effect is a bit like a carbon price.
- Does the presence of this Mechanism change the appetite for consumers to forward contract?

Do MAC members have any other comments on cost recovery?

Next steps

Next steps

Complete modelling to assess impact of policy under different market conditions

24 September WIC Review Working Group meeting to discuss:

- How to determine discount factor.
- Eligibility start date
- Modelling outputs

15 October MAC meeting: final proposals

Consultation paper

Thank you

Appendix

Excerpts from NEM review ToR

“The Panel is to recommend future market settings to promote investment in firmed, renewable generation and storage capacity in the National Electricity Market (NEM) following the conclusion of Capacity Investment Scheme tenders in 2027.”

“Beyond [the CIS] there is a need for wholesale market settings to provide effective signals to investors for the provision of the optimal mix of energy in the NEM, ensuring resource adequacy and supporting reliability in the NEM at lowest cost to consumers.”

“The expert panel will not consider options that involve implementation of carbon trading schemes, carbon markets or that entail governments supporting new fossil fuel generation.”

Assessment criteria

Assessment criteria

1. Deliverability – Delivers capacity by 1 Oct 2030
2. Sustainability – Sustainable until 2035
3. Cost – revenue certainty for renewables
4. Cost – minimise costs (potential to get lowest cost)
5. Cost – minimise risks (risk of cost blowout)
6. Cost – allocate costs appropriately (large users not hit)
7. Financial - Delivers a competitive outcome
8. Financial - Reduces WA government financial exposure (does Synergy cover an unfair share)
9. Market – maintains incentives to produce energy
10. Market – minimises impact on competitive market

Assessment Criteria – Timeline

Deliverability

The WA Government is committed to closing Synergy's coal-fired power stations by 2030. To support this, while maintaining system security and reliability, requires significant volumes of renewable generation to provide sufficient energy to the system by 2030.

Therefore, the market mechanism must be implemented by the end of 2027, before the start of the 2028 Reserve Capacity Cycle in January 2028. This criteria focuses on the feasibility of commencing the mechanism by December 2027.

Sustainability

The Market Mechanism must be able to be efficiently sustained until at least Capacity Year 2035-36, and until it can be replaced by a new mechanism designed for a primarily renewable SWIS, and simple to maintain in a small market such as the WEM.

Assessment Criteria - Cost

Revenue certainty for renewables

The Market Mechanism must provide confidence to investors in the revenue that a given project will earn.

Minimise Cost

The Market Mechanism must deliver the lowest feasible cost to consumers while meeting all other criteria.

Minimise Risk

The Market Mechanism must not impact, reliability or security of supply or lead to inefficient market outcomes.

Allocate Cost Appropriately

This criteria assesses whether the mechanism reasonably allocates costs.

Assessment Criteria – Financial & Market

Competitive outcome

The mechanism needs to provide some level of competitive pressure between renewable developers to participate. It should encourage enough renewables to meet market demand and deliver secure and reliable energy, while not encouraging unnecessary build.

Reduces WA Taxpayers financial exposure

The mechanism should not require direct government expenditure or underwriting. That includes ensuring that Synergy does not shoulder more than its reasonable share of the cost to develop renewables.

Incentive to produce

Aside from incentivising development of renewables, the market mechanism should also ensure that energy production is rewarded. That is, renewable generators are exposed to the RTM energy price in some way, so that their real-time behaviour matches market needs.

Minimise impact on market

The market mechanism should have minimal impact on the existing competitive energy and ESS markets. Incentive to invest in renewables should not interfere with current market arrangements in a way that affects the competitive outcomes.

Option: Voluntary Secondary Market

Voluntary secondary market (1)

Green energy trading already exists in Australia, where renewable energy generated is treated like a commodity – typically in the form of energy certificates or environmental credits. Similarly, central trading of standardised electricity contracts is a feature of most electricity markets around the world, including Australia, but not in the WEM. This option presents a mechanism for trading renewable electricity in the WEM, where:

- Participants agree a standard form of contract that covers both capacity and energy
- Energy users (generators, retailers, and large consumers) develop a central platform to trade energy and capacity.
- Trading would be voluntary

Voluntary secondary market (2)

Although this mechanism is straightforward, setting up a new platform would require significant effort. This includes establishing standard contract forms, developing the platform, and participant adoption. Contract design could be informed by a NEM working group which is developing standardised contracts for bulk energy, shaping, and firming.

A voluntary trading platform would allow smaller users to sign contracts for renewable energy without underwriting an entire renewable project. It would reduce friction for contracting, improving depth and liquidity of the contracts market, but by itself would not be sufficient to ensure revenue certainty for renewable developers.

Initial assessment – Voluntary secondary market

Assessment criteria		Reason
Deliverability	✓	A simple bulletin board would have minimal implementation effort. Agreeing a standardised contract would be the most difficult activity
Sustainability	✓	As the volume of renewable energy increases, a more sophisticated platform could deliver additional value, but a simple platform would still be useful
Revenue Certainty	×	A secondary market would provide another route to market, but does not guarantee long run costs are covered
Minimise Cost	✓	Increased liquidity and transparency of contract pricing would place downward pressure on contract prices by reducing transaction friction
Minimise Risks	✓	Transactions between willing buyers and sellers reduce potential for unexpected cost imposition
Allocate costs appropriately	✓	Transactions between willing buyers and sellers allows costs to be set at an appropriate level
Competitive outcome	✓	Matching based on offers and bids allows competition to occur
Reduce taxpayer exposure	✓	More efficient contract pricing would improve retailers' (including Synergy) ability to negotiate with generators
Incentive to produce	✓	Contracts with an energy component retain incentives for renewable generators to produce energy
Minimise impact on market	✓	No impact on RTM dynamics

Option: Renewable BRCP

Renewable BRCP (1)

The BRCP is based on the cost of installing the cheapest low emissions technology in the SWIS. In the 2024 cycle, the benchmarked technology was an OCGT. In the 2025 cycle it was a 4-hour BESS, and for the 2026 cycle it is a 6-hour BESS.

The current capacity price is not sufficient to cover the capital costs of intermittent renewables. If the benchmark technology was changed to wind or solar, there would be a significant increase in the capacity price, and significant over-recovery of cost for all other technologies, including storage facilities and thermal generation.

Rather than applying the same BRCP to all facilities, this option would implement different BRCPs for different Capability Classes where:

- Classes 1 and 2 follow the current BRCP.
- A separate BRCP is determined for Class 3, based on a renewable benchmark technology.

Renewable BRCP (2)

Not all renewable capacity would be eligible.

AEMO would calculate a separate Reserve Capacity Requirement for renewable generation based on rule 4.5.12(i), which is the minimum required quantity of energy generating capacity (Class 1 and 3)

- In years with a capacity shortfall, all renewable class 3 new entrants would be eligible to receive the Renewable BRCP. This would incentivise pulling capacity investment forward.
- In years without a capacity shortfall, the Renewable BRCP would only apply to the extent any oversupply remains under the prescribed 103%.

As the quantity of renewable generation entry increases:

- The capacity price for the current capacity cycle would reduce based on the capacity price curve.
- The benchmark price in the following capacity cycle would increase to reflect lower capacity contribution of new generation.

This mechanism would reuse existing rule constructs, with moderate rule changes and changes to relevant processes and procedures.

Incentives to generate and firm

Capacity payments incentivise energy production during the IRCR intervals.

Capacity payments do not incentivise firming, but exposure to Real-Time Market price signals does.

The NAQ regime will likely not provide sufficient incentive to connect to an uncongested part of the network, because variable renewable facilities receive significantly less Certified Reserve Capacity than their nameplate capacity. However, network constraints would lead to renewable generators curtailment, which should provide the necessary incentive.

Initial assessment – Renewable BRCP

Assessment criteria		Reason
Deliverability	✓	This Mechanism builds on existing rules and processes.
Sustainability	✓	The programme could operate indefinitely, and represents a potential long term solution. However, it could be difficult to revert to a single BRCP at the end of the programme
Revenue Certainty	✓	A BRCP based on the long run costs of renewable technology would provide revenue certainty
Minimise Cost	-	A higher capacity price for renewable generation would lead to higher capacity costs for consumers. This may or may not be offset by RTM price decreases. This will be assessed through market modelling
Minimise Risks	-	The interaction between the RCP curve and the projected reduction in Capacity Credits for non-firmed renewable generators could potentially lead to significant cost increases over time
Allocate costs appropriately	✓	Costs would be allocated to capacity purchasers, who remain free to negotiate bilateral contracts to reduce their exposure to the higher priced Capacity Credits
Competitive outcome	✗	An administered capacity price available to all renewable generators can reduce competitive outcomes
Reduce taxpayer exposure	✓	Retailers pay costs on behalf of electricity users
Incentive to produce	✓	Generators retain incentive to generate and earn payment for energy
Minimise impact on market	✓	RTM operations are not affected

Option: Minimum average energy price

Additional detail

Setting the target minimum price

The target capture price represents the contribution from energy market payments required to meet build costs. It will be calculated based on the most efficient new entrant, as follows:

((CSIRO capital cost multiplied by regional uplift ratio, divided by expected asset life) less
(capacity payment * expected nameplate:CRC ratio))

divided by

(expected post-curtailment capacity factor multiplied by number of hours in the year)

The price will be revised each year for new facilities based on updated CSIRO data and the capacity price from the previous year.

Facilities can choose to fix their price for 10 years, with CPI adjustments, or to take the annual recalculated price. They must decide in their first application.

The calculation could include a discount factor to reflect WACC. This would increase the annual recovery requirement.

Calculating payments (1)

The minimum price for each eligible facility would be calculated as follows:

max(0, target capture price less generation weighted average capture price)

And the top up payment to each eligible facility would be calculated as follows:

support price * (total annual generation less bilateral contract volumes)

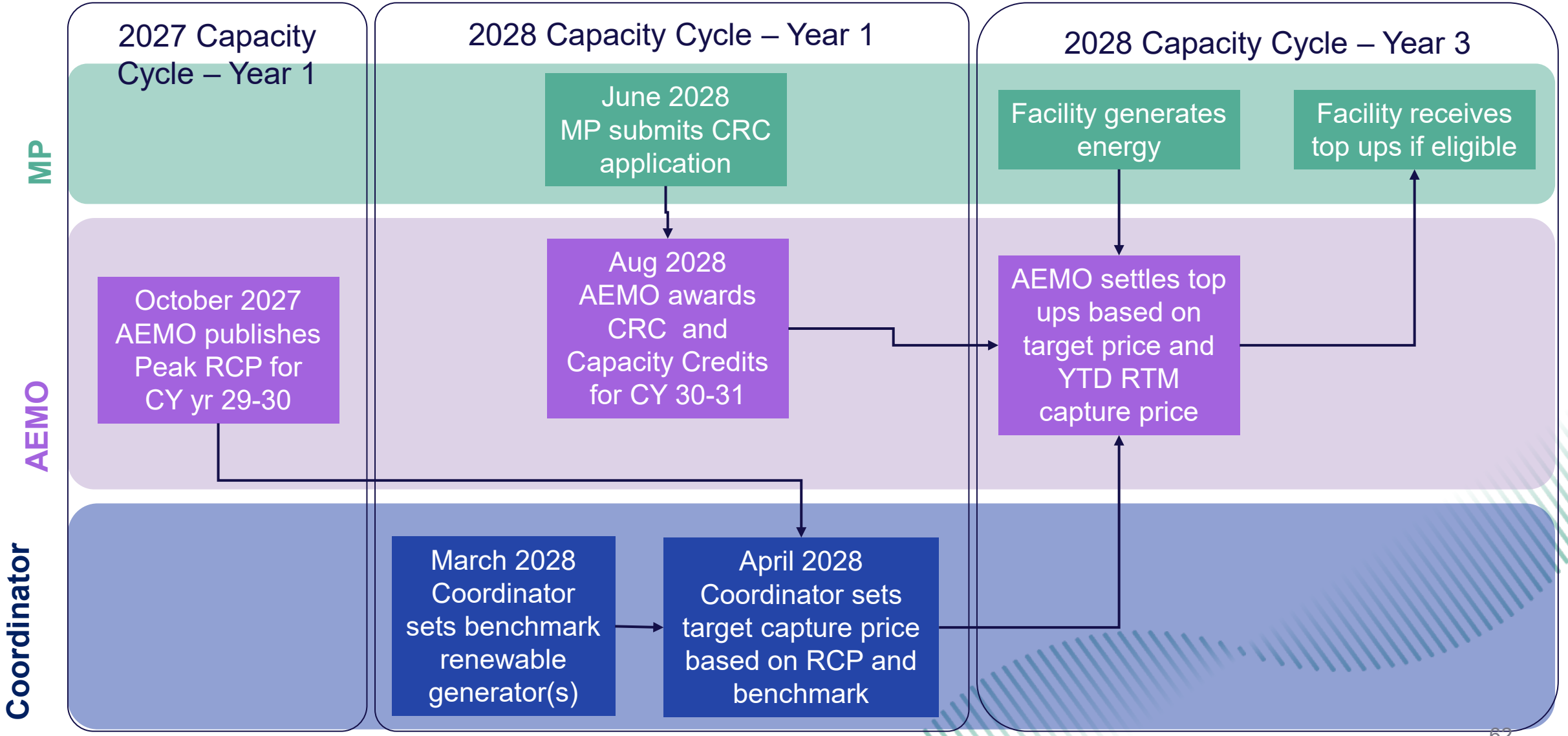
The generation weighted average capture price would be calculated using a minimum Real-Time Market price of $0/MWh. In periods where the Real-Time Market price is negative, the calculation would use a deemed capture price of $0. This avoids incentives for renewable generators to drive Real-Time Market prices below cost in order to increase support prices.

Calculating payments (2)

Although the Mechanism aims to ensure a minimum capture price across the whole year, it would not be prudent to wait until the end of the year to calculate top-up payments and recover costs. Doing that would mean a new, large financial exposure outside the regular settlement cycle, and provide an additional source of commercial risk for market participants.

Instead, interim calculations would need to be conducted in each settlement period, calculating the year-to-date average capture price, and the year-to-date top-up payment. If a period with low prices results in top up payments, and is followed by a period of high prices, the top-up payments for the previous period would be clawed back. By the end of the year, the total top up payment would match the formula above.

Example timeline for CY 2030



Accounting for renewable contracts in WEM settlement (1)

To exclude existing contracts in WEM settlement would require knowing how much of a facility's output is and is not covered by contracts.

While participants currently declare bilateral contract positions as input to the STEM:

- Bilateral submissions do not identify which facilities the energy comes from
- Declared contract quantities may not include renewable energy volumes at all, as energy from intermittent facilities is not required to be offered in STEM.
- There is currently no provision for participants to update bilateral contract positions once intermittent generation volumes are known.

As a result, while WEM settlement does net out some bilateral contract volumes at portfolio level, participants with variable volume contracts manage this in their off-market contract settlement.

If the generating party is long, and paid the RTM price for its uncontracted energy, then the consuming party will be short, and will pay the RTM price. In their contracts, parties agree to pay the difference between the market price and the contract price through off-market billing and payment processes.

Accounting for renewable contracts in WEM settlement (2)

Accounting for renewable purchases in WEM settlement, so that consumers with renewable contracts do not pay top ups would require:

- Including source facility information in bilateral submissions,
- Allocating renewable volumes to each consuming participant
- Allowing participants to update bilateral contract volumes after meter data is available

This would require significant additional complexity in the STEM and settlement systems.

Time granularity for cost recovery

Some WEM costs are recovered on a trading interval basis. E.g. energy and FCESS. Others are recovered on a longer timeframe (e.g. capacity payments, market fees).

Renewable mechanism costs could be recovered based on:

a. Consumption in each trading interval
b. Consumption in the settlement period
c. Consumption year-to-date

Because top-up payments are calculated and distributed in each settlement period with adjustments in subsequent periods, using trading interval data would require recalculating all past trading intervals every settlement run. Similarly, using consumption in the settlement period would require adjusting recalculating cost recovery for every previous settlement period. Using year-to-date consumption only requires keeping track of one variable for each participant from one settlement period to the next

Minimum average price for renewables

Effects on market incentives

Renewable generators

A generator could attempt to manipulate its top-up payments by their offer strategies. If a generator offers prices:

- Higher than actual costs

  It is less likely to be dispatched, and less likely to trigger a need for top up payments.

  Because renewable generators have low or zero variable costs, there should be limited benefit from this kind of manipulation.

- Lower than actual costs

  It is more likely to be dispatched, and more likely to trigger a need for top up payments. This is likely to occur when available renewable energy exceeds demand, renewable generation is curtailed, and generators compete to be dispatched.

  When this happens, consumers will pay more in top-ups, but this would be offset by the RTM energy price being lower than otherwise. By definition, the increase in the required top up payment would never be more than the reduction in the RTM price, so any manipulation would not increase the total paid by consumers.

Contracted parties

Participants could try to manipulate market outcomes by submitting incorrect contract volumes.

If Party A (generator) and Party B (consumer) have a contract for renewable generation which is eligible for top-up payments, Party A declaring bilateral contract volumes:

- Greater than actual volumes will:
  - reduce the quantity of energy exposed to RTM prices
  - Make no difference to the volume of energy eligible for top-up payments.
- Less than actual volumes will:
  - Increase the quantity of energy exposed to RTM prices
  - Make no difference to the volume of energy eligible for top-up payments

In both cases, the on-market settlement outcomes would be adjusted through off-market settlement processes to match contract terms. There is no effect on payments to and from other market participants.

Vertically integrated generator-retailers

Vertical integration is a natural hedge, so energy produced and consumed by the same participant is netted out of WEM settlement.

Vertically integrated generator-retailers will be treated the same as standalone generators and retailers.

- New renewable generators are eligible for top up payments
- Consumers pay towards cost recovery according to their actual withdrawal and injection from non-renewable facilities.

Rather than managing top-up payments through off-market billing and payment between organisations, vertically integrated entities can manage it through internal accounting processes.

Storage facilities

Some WEM storage facilities do not have contracts for energy. They arbitrage the price spread in the real time market, charging during low priced periods in the middle of the day and discharging during higher priced periods in the evening.

If these facilities consume energy to which top ups apply, some of the cost will be recovered from them, meaning that the RTM energy price will no longer be the sole determinant of their cost to charge. This will in turn flow through to their discharge offers according to ERA offer construction guidelines.

This does not mean that prices will be higher overall, as a higher penetration of renewables is still likely to see lower average prices even after accounting for top up-payments.

Minimum average price for *firmed* renewables

Straw man

Overview

A minimum price would reward energy from renewables generated at any time, including in the middle of the day.

If there is sufficient storage to absorb the available energy, it does not matter when it is generated.

If there is insufficient storage to absorb the available energy, renewable output will be curtailed, and the curtailed energy will not be compensated.

This provides an indirect incentive for renewable developers to ensure that their energy can be used or stored.

Alternatively, policy could provide direct incentive for renewable energy to be available during times of system stress.

This option amends the minimum price proposal to only apply to energy produced during the ESR obligation intervals (as a proxy for the desirable time).

Setting the target capture price for solar+storage

The target capture price represents the contribution from energy market payments required to meet build costs. It will be calculated based on the most efficient new entrant solar + storage facility where:

- nameplate capacity of the solar facility = 0.5 * system size of the storage component
- The storage duration of the storage component is the ESROD.
- The target price is calculated as:
  - Equivalent annual cost per MW
    - (CSIRO capital cost multiplied by regional uplift ratio) * Discount Rate
    - divided by (1 – (1+discount rate)^(-1*expected asset life)
  - less capacity payments per MW
    - 0.5 * Capacity price * expected nameplate:CRC ratio for solar
    - plus 0.5 * Capacity price * expected nameplate:CRC ratio for storage
  - divided by:
    - expected pre-curtailment capacity factor for solar component
    - multiplied by number of hours in the year

Calculating payments for solar+storage

The minimum price for a solar+storage facility would be calculated as follows:

max(0, target capture price less generation weighted average capture price during the ESROI)

And the top up payment to each eligible facility would be calculated as follows:

- support price multiplied by
- Sum over all days of:
  - Minimum of:
    - total daily generation from solar facility
    - total injection during ESROI
  - less bilateral contract volumes during ESROI

The generation weighted average capture price would be calculated using a minimum Real-Time Market price of $0/MWh. In periods where the Real-Time Market price is negative, the calculation would use a deemed capture price of $0.

Implications of generation outside ESROI

- If the participant generates outside the ESROI, they bear both downside and upside risk.
- If the average capture price outside the ESROI is higher than the target price, then any topups during the ESROI will make them more than whole.
- If the average capture price outside the ESROI is lower than the target price, they will not receive any topup for it.

Department of Energy and Economic Diversification
GOVERNMENT OF WESTERN AUSTRALIA

Energy Policy WA

Agenda Item 8: WEM Operation Effectiveness Report – Progress Update

Market Advisory Committee (MAC) Meeting 2026_09_03

1. Purpose

Energy Policy WA (EPWA) to update the MAC on the progress of implementing the recommendations from the Coordinator of Energy's (Coordinator's) inaugural Wholesale Electricity Market (WEM) Operation Effectiveness Report.

2. Recommendation

That the MAC notes:

- the update on the progress of implementing the recommendations from the first WEM Operation Effectiveness Report since the previous MAC meeting, which are shown in red in the Tables below.

3. Background

Under clause 2.16.13D of the Electricity System and Market (ESM) Rules, the Coordinator must provide the Minister of Energy (Minister) with a report dealing with the matters identified through its market monitoring activities at least once every three years, with the first such report due by 1 July 2025.

The Coordinator provided the first WEM Operation Effectiveness Report (the Report), that covered matters outlined in clauses 2.16.13A, 2.16.13B and 2.16.13E of the ESM Rules, to the Minister on 25 June 2025.

- After consultation with the Minister, the Coordinator published a version of the Report on 8 July 2025 on the Coordinator's website.
    - Any confidential and/or sensitive data was either aggregated or removed.
- The published report is to serve as a point of reference of further work required by AEMO, the ERA, EPWA and Western Power to improve market effectiveness, including through future ESM Amending Rules.

Table 1 – Recommendations relevant to all Market Bodies

Recommendation	Status	Update
Proactive reporting of Market Bodies on WEM design flaws and areas for improvement	Ongoing	EPWA, AEMO and the ERA have established fortnightly Market Surveillance meetings to discuss WEM design flaws and areas for improvement. Updates, as appropriate, will be provided to the MAC by EPWA or the AEMO at its relevant forums. Additionally, AEMO and EPWA have established regular meetings at Executive level and are working together to establish a new 'Market and Systems Issues Log' that will enable improved information sharing and tracking of solutions between the two agencies.
Improvement of accessibility across all market bodies' websites and published materials	Ongoing	On 17 September 2025, the ERA implemented a new website design, moving to a function-based structure and restructured its WEM section. Western Power's webpage 'The Wholesale Electricity Market and Market Information Management' lists its WEM Procedures, Guidelines and other market information. This new page is also easily discovered by search engines.

Table 2 – Recommendations relevant to AEMO

Recommendation	Status	Update
Provision of further detail on the cause of any direction/intervention by AEMO.	Ongoing	The ongoing Frequency Co-optimised Essential System Services (FCESS) Cost Review (Stage 2) is addressing this proposal.
Improvements in relation to operational forecasting.	Ongoing	The ongoing Operational Forecasting Review is addressing this proposal. In parallel to the Review, AEMO has progressed an internal Project to uplift AEMO's operational forecasting capabilities, which includes several initiatives aligned with EPWA's proposals. AEMO consulted on the draft Implementation Assessment for the uplift project through the Major Projects Working Group, which included a presentation at the 16 May 2026 meeting. The project involves upgrading AEMO's forecasting software platform, building better forecast models (using new data inputs) and improving data ingestion and establishing auditable input storage. It's currently in its execution phase and is expected to be completed around November 2026. Further information can be found on AEMO's website.

Recommendation	Status	Update
Completion and publication of WEM Procedures in a timely manner, including prompt updates when required.	Ongoing	The WEM Procedure Content Review will address some of the issues highlighted in the Report. As highlighted in the Report, there were still nine WEM Procedures outstanding from the date of the new WEM commencement. AEMO has since finalised and commenced six. One is currently out for consultation, and another has a completed draft that is expected to be published for consultation in the coming months. MT PASA remains subject to extended delay, as previously explained to industry at the July 2025 AEMO Procedure Change Working Group and notified to MAC. AEMO has also implemented new internal processes to support the timely development of Procedures. This includes uplifted Procedure tracking and reporting tools (that enhances oversight by Managers and the Senior Leadership Team and highlights resourcing requirements and risks early).
Making complete and verified market data available through the publicly accessible web portal in easily accessed data formats.	Ongoing	AEMO's Data Uplift Project is a priority initiative for FY26 and will help address the findings from the Report around the availability of data through AEMO's website. Phase 1 of the project is now complete, with new and existing data reports available in additional formats, including CSV. Phase 2 of the project, which includes updates to the WEM data dashboard is expected to be completed by May 2027. Information on the progress of the project will be advised through updates to the WEM Implementation Roadmap.

Table 3 – Recommendations relevant to the ERA

Recommendation	Status	Update
Provision of clearer information to Market Participants regarding the current priorities and focus of the ERA's surveillance and compliance activities, noting that confidential information must be protected.	Ongoing	EPWA is drafting ESM Amending Rule changes to introduce an obligation for the ERA to publish annual priorities.

Table 4 – Recommendations relevant to Western Power

Recommendation	Status	Update
Transformation of the Transmission System Plan, in the medium term, into a broader Networks Plan that includes a complete transmission and distribution development roadmap, to provide an informed view of investment opportunities. Supporting information should include constraint data, cost-benefit analyses and improved distribution level heat maps.	Starting	To be commenced.

Table 5 – Recommendations relevant to EPWA

Recommendation	Status	Update
The Coordinator will work with the Market Bodies and other stakeholders on how to integrate the State Electricity Objective more broadly within the ESM Rules and will monitor this in the next WEM Operation Effectiveness Report.	Starting	To be commenced.

Department of Energy and Economic Diversification

GOVERNMENT OF WESTERN AUSTRALIA

Energy Policy WA

Agenda Item 9: Market Development Forward Work Program

Market Advisory Committee (MAC) Meeting 2026_09_03

1. Purpose

- To update the MAC on changes to the Market Development Forward Work Program since the previous MAC meeting, which are shown in red in the Tables below.
- Rows that are shaded grey are complete and will be removed for the next MAC meeting.

2. Recommendation

The MAC Secretariat recommends that the MAC:

- notes the updates in the paper.

3. Process

Stakeholders may raise issues for consideration by the MAC at any time by sending an email to the MAC Secretariat at energymarkets@deed.wa.gov.au.

Stakeholders should submit issues for consideration by the MAC two weeks before a MAC meeting so that the MAC Secretariat can include the issue in the papers for the MAC meeting, which are circulated one week before the meeting.

Table 1 – Current MAC Working Groups			
Working Group	**Established**	**Status**	**Next steps**
WEM Procedures Content Review	2 May 2024 MAC Meeting	Open	EPWA is currently reviewing Priority 1 WEM Procedures
Capability Class 2 Technologies Review	24 July 2025 MAC Meeting	Open	Consultation Paper published, closes on 1 September 2026
Essential Systems Services Framework Review	2 May 2024 MAC Meeting	Open	Metrics for monitoring Frequency Co-optimised Essential System Services published
AEMO Procedure Change	1 May 2017 MAC Meeting	Open	Ongoing Process
AEMO Major Projects	1 May 2025 MAC Meeting	Open	Ongoing Process
Power System Security and Reliability Standards	23 November 2023 MAC Meeting	Open	Information Paper and Exposure Draft published on 20 August 2026, with consultation closing on 21 September 2026. Further Consultation Paper published on 20 August 2026, with consultation closing 21 September 2026
Wholesale Electricity Market Investment Certainty Review	20 July 2023 MAC Meeting	Open	Publication of Consultation Paper on the Renewable Energy Mechanism
Cost Allocation Review	14 December 2021 MAC Meeting	Finishing	Schedule 3 is the last schedule of the of the Wholesale Electricity Market Amendment (Cost Allocation Reform) Rules 2024 for which a commencement date is yet to be specified by the Minister

Table 2 – Market Development Forward Work Program		
Review	**Issues**	**Status and Next Steps**

Cost Allocation Review (CAR)	A review of:
	• the allocation of Market Fees, including behind the meter (BTM) and Distributed Energy Resources (DER) issues;
	• cost allocation for Essential System Services; and
	• Issues 2, 16, 23 and 35 from the MAC Issues List.
		• The MAC established the Cost Allocation Review Working Group (CARWG). Information on the CARWG is available at Cost Allocation Review Working Group, including:
		  • the Scope of Work for the review, as approved by the Coordinator;
		  • the Terms of Reference for the CARWG, as approved by the MAC;
		  • the list of CARWG members;
		  • meeting papers and minutes from the CARWG meetings on 9 May 2022, 7 June 2022, 30 August 2022, 27 September 2022, 25 October 2022, 29 November 2022, 21 March 2023, 2 May 2023 and 29 August 2023.
		• The following papers have been released and are available on the CAR webpage at Cost Allocation Review:
		  • the Consultation Paper;
		  • the International Review;
		  • submissions on the Consultation Paper;
		  • the CAR Information Paper;
		  • the Exposure Draft of the ESM Amending Rules implementing the outcomes of the CAR;
		  • submissions on the CAR ESM Amending Rules Exposure Draft; and
		  • response to submissions on the CAR ESM Amending Rules Exposure Draft.

Table 2 – Market Development Forward Work Program		
Review	**Issues**	**Status and Next Steps**

		• the Wholesale Electricity Market Amendment (Cost Allocation Reform) Rules 2024 available at Wholesale Electricity Market Amendment (Cost Allocation Reform) Rules 2024.
		• Further changes to refine the cost allocation method for the Contingency Reserve Raise Service were presented at the 18 June 2024 TDOWG and consulted on within the Miscellaneous Amendments No. 3 Exposure Draft.
		• The last set of changes (to Contingency Reserve Raise cost allocation) implementing the outcomes of this Review were included in the Amending Rules made by the Minister on 2 October 2024.
		• AEMO to confirm implementation dates.
		• An Exposure Draft was released on 19 August 2025 on changes to Contingency Reserve Lower that affects Schedule 4 of the *Wholesale Electricity Market Amendment (Cost Allocation Reform) Rules 2024*.
		  • Consultation closed 2 September 2025.
		  • One stakeholder submission was received, which was published on 26 September 2025.
		• By gazettal on 26 September 2025, Schedules 2 and 4 of the *Wholesale Electricity Market Amendment (Cost Allocation Reform) Rules 2024* will commence on 30 October 2025.
		• Schedule 3 is the last schedule of the of the Wholesale Electricity Market Amendment (Cost Allocation Reform) Rules 2024 for which a commencement date is yet to be specified by the Minister.

Table 2 – Market Development Forward Work Program		
Review	**Issues**	**Status and Next Steps**

Review of the Power System Security and Reliability (PSSR) Standards	The scope of this review is to:
	• review the various PSSR related provisions in the instruments governing power system security and reliability in the SWIS;
	• assess whether the combination of existing standards is effective to ensure power system security and reliability can be maintained;
	• develop proposals for a single end-to-end PSSR standard and a centralised governance framework; and
	draft amending Rules and other regulatory changes, as necessary.
		• The MAC established the PSSR Standards Working Group (PSSRSWG). Information on the PSSRWG is available at Power System Security and Reliability (PSSR) Standards Working Group including:
		  • the Terms of Reference for the PSSRSWG, as approved by the MAC;
		  • the Scope of Work
		  • the list of PSSRSWG members; and
		  • meeting papers and minutes for the 14 December 2023, 1 February 2024, 29 February 2024, 18 April 2024, 25 July 2024, 10 October 2024 and 31 October 2024 PSSRSWG meetings.
		• DEED has previously sought stakeholder feedback on proposed review outcomes from the PSSR Standards Review through three consultation papers. Papers and stakeholder submissions received are published on the PSSR Standards Review webpage.
		  • 19 June 2025 – Consultation Paper
		  • 30 September 2025 – Further Consultation Paper – Proposal 20
		  • 20 December 2025 – Western Power Technical Paper.
		• On 20 August 2026, an Information Paper and Exposure Draft were released for public consultation, including:
		  • establishing a Forecast and Planning Coordination Group, chaired by the Coordinator of Energy and comprising representatives from AEMO and Western

Table 2 – Market Development Forward Work Program		
Review	**Issues**	**Status and Next Steps**
		Power, to align forecasting and planning approaches and methodologies; • clear roles and responsibilities, with AEMO responsible for forecasting system strength shortfalls and Western Power responsible for procuring network and non-network solutions to address shortfalls; and • updated technical requirements for grid-following (GFL) and GFM inverter-based resources (IBRs). • A further Consultation Paper published 20 August 2026, that builds on the above review outcomes and seeks stakeholder views on additional, targeted measures to complement them. In particular: • a proposed regulatory incentives framework to minimise system strength shortfalls, and reduce the cost of any procurement of solutions by Western Power; • guidance on how hybrid systems combining GFM and GFL technologies will be assessed during connection or relevant modification; • requiring existing participants to provide models to improve whole-of-system modelling and planning; and • enabling Western Power to require changes to control settings, enhancing the scope of existing provisions, to maintain system stability as IBR penetration increases.

Table 2 – Market Development Forward Work Program		
Review	**Issues**	**Status and Next Steps**
WEM Procedure Content Review	The scope of this review is to assess the content of selected existing WEM Procedures and their heads of power to determine, using the guiding principles, whether any matters identified require changes to improve the effectiveness of WEM Procedures, including, but not limited to: • the potential elevation of certain content to the ESM Rules; and/or • changes to a WEM Procedure heads of power.	• A revised Scope of Works and Terms of Reference was presented to the MAC at the 4 September 2025 Meeting to reflect the proposals from the 2025 WEM Operation Effectiveness Report. • On 11 September 2025, a MAC member provided EPWA with WEM Procedures that should be included in the review. • EPWA is currently reviewing Priority 1 WEM Procedures, as outlined in the Scope of Works.
Procedure Change Process (PCP) Review	A review of the PCP to address issues identified through Energy Policy WA's consultation on governance changes.	• The MAC discussed a draft Scope of Work for this review at its meeting on 11 October 2022. EPWA has updated the Scope of Works to reflect the MAC discussions. • The Scope of Work for the review, as approved by the Coordinator is available here Wholesale Electricity Market Procedure Change Process Review (www.wa.gov.au) • ACIL Allen has been appointed to assist with the PCP review. • ACIL Allen engaged with MAC members through a survey and one-on-one consultations between 12 March and 18 April 2024. There were 11 respondents to the PCP survey, out of 19 requests. • On 6 May 2024, the Consultation Paper was released for public consultation. Submissions closed 31 May 2024 with stakeholder submissions published on the Coordinator's website.

Table 2 – Market Development Forward Work Program		
Review	**Issues**	**Status and Next Steps**
		• On 9 August 2024, the Coordinator finished stage 1 by publishing the ACIL Allen report and his response on the Coordinator's website. • EPWA is progressing stages 2 and 3 of the review and is revising a draft consultation paper to reflect the MAC's feedback from the 5 September 2024 MAC meeting.
Review of the Essential Systems Services (ESS) Framework	The Coordinator of Energy (Coordinator) is conducting a review of the ESS Framework (the Review), incorporating: • a review of the ESS Process and Standards under Section 3.15 of the ESM Rules; and • a review of the Supplementary Essential Systems Services Procurement Mechanism (SESSM) under clause 2.2D.1(h). The purpose of this Review is to assess whether the FCESS framework in the ESM Rules is operating efficiently to ensure power system security and reliability can be maintained at the lowest cost to consumer.	• The MAC approved the establishment of the ESS Framework Working Group (ESSFRWG) to support the ESS Framework Review. Information on the ESSFRWG is available at Essential System Services Framework Review Working Group including: • The Terms of Reference for the ESSFRWG, as approved by the MAC; • The list of ESSFRWG members; • Meeting papers and minutes for 6 November 2024, 26 February, 26 March and 24 July 2025 meetings. The following papers have been released and are available on the ESS Framework Review webpage: • The Scope of Work for the Review. • The Essential System Services Framework Review Consultation Paper. • An addendum (of proposed ESM Amending Rules) to the Essential System Services Framework Review – Consultation Paper

Table 2 – Market Development Forward Work Program		
Review	**Issues**	**Status and Next Steps**
		• Stakeholder submissions to the Essential System Services Framework Review Consultation Paper and addendum • The Amending Rules to relax the RoCoF Safe Limit were included in the Electricity System and Market Amendment (Tranche 9) Rules 2025 were approved by the Minister for Energy on 19 December 2025, published in the Government Gazette on 23 December 2025 and commenced on 26 February 2026 • The metrics for monitoring Frequency Co-optimised Essential System Services.
WEM Investment Certainty (WIC) Review	The WIC Review will consider, design and implement the following five reforms that have been announced by the Minister for Energy, which are aimed at providing further investment certainty to assist the decarbonisation of the WEM: (1) changing the Reserve Capacity Price (RCP) curve so it sends sharper signals for investment when demand for new capacity is stronger; (2) a 10-year RCP guarantee for new technologies, such as long-duration storage; (3) a wholesale energy price guarantee for renewable generators, to top up their energy revenues as WEM prices start to decline, in return for them firming up their capacity; (4) emission thresholds for existing and new high emission technologies in the WEM; and	• The MAC established the WIC Review Working Group (WICRWG). Information on the WICRWG is available at Wholesale Electricity Market Investment Certainty (WIC) Review Working Group including: • the Terms of Reference for the WICRWG, as approved by the MAC; • the list of WICRWG members; • meeting papers and minutes from the 31 August 2023, 11 October 2023, 8 November 2023, 6 December 2023, 24 January 2024, 24 April 2024, 29 May 2024, 25 June 2026, 16 July and the 23 July 2026 WIC Review Working Group meetings. • meeting papers from the 6 and 20 August 2026 WIC Review Working Group meeting. • The following papers have been released and are available on the WIC Review webpage, including:

Table 2 – Market Development Forward Work Program		
Review	**Issues**	**Status and Next Steps**
	a 10-year exemption from the emissions thresholds for existing flexible gas plants that qualify to provide the new flexibility service.	• the Scope of Work for the review, as approved by the Coordinator; • the WIC Review (Initiatives 1 and 2) Consultation Paper; • the submissions received on the WIC Review (Initiatives 1 and 2) Consultation Paper; • the WIC Review (Initiatives 1 and 2) Information Paper; • The Exposure Draft of ESM Amending Rules to implement Initiatives 1 and 2; • Submissions for the Exposure Draft of WEM Investment Certainty and RCM Review Amending Rules; and • Response to Submissions for the Exposure Draft of WEM Investment Certainty and RCM Review Amending Rules. • The ESM Rules implementing the Review Outcomes for Initiatives 1 and 2 of the WIC Review are in Wholesale Electricity Market Amendment (RCM Reviews Sequencing) Rules 2025. The Rules were approved by the Minister for Energy and published in the Government Gazette on 14 January 2025. • The WICRWG convened on 14 August 2025 and on 16 July 2026 to discuss the Coordinator's review of the Benchmark Capacity Providers. • meeting papers and minutes for this meeting are available at Wholesale Electricity Market Investment Certainty (WIC) Review Working Group page.

Table 2 – Market Development Forward Work Program		
Review	**Issues**	**Status and Next Steps**

		• The following papers for the 2025 Benchmark Capacity Provider Review have been released and are available on the webpage:
		  • Scope of Work, Consultation Paper, Stakeholder submissions and The Coordinator's Determination, including responses to submissions
		• The following papers for the 2026 Benchmark Capacity Provider Review have been released and are available on the webpage:
		  • Scope of Work

Capability Class 2 Technologies Review (CC2TR)	The Review will consider:
	• whether market design changes are required to maintain Power System Security and Reliability (PSSR) with the growing share of Electric Storage Resource (ESR) in the South West Interconnected System (SWIS);
	• whether the methodology for rating the capacity of ESR for the purposes of setting Certified Reserve Capacity remains consistent with the State Electricity Objective (SEO);
	• whether the Demand Side Programme (DSP) Obligation Duration remains consistent with the SEO; and
	whether the ESR obligation intervals (ESROI), including the effectiveness of the method used by AEMO to determine the ESROI, is consistent with the SEO.
		• The MAC established the Capability Class 2 Technologies Review Working Group (CC2TRWG). Information on the CC2TRWG is available at Capability Class 2 Technologies Review Working Group, including:
		  • the Terms of Reference for the CC2TRWG, as approved by the MAC;
		  • the list of CC2TRWG members;
		  • Meeting papers and minutes for the 23 October 2025, 4 December 2025, 5 February 2026, 26 March 2026, 2 April 2026 and 23 April 2026 meeting CC2TR Working Group meeting.
		• The following papers have been released and are available on the CC2TR webpage:
		  • the Scope of Works; and
		  • the Consultation Paper.

Table 2 – Market Development Forward Work Program		
Review	**Issues**	**Status and Next Steps**
Forecast quality	Review of Issue 9 from the MAC Issues List.	• This review has been incorporated in the Operational Forecasting Review.
Network Access Quantity (NAQ) Review	Assess the performance of the NAQ regime, including policy related to replacement capacity, and address issues identified during implementation of the Energy Transformation Strategy (ETS).	• The timing for this review is to be determined.
Short Term Energy Market (STEM) Review	Review the performance of the STEM to address issues identified during implementation of the ETS.	• This review has been deferred.

Table 3 – Other Issues			
Id	**Submitter/Date**	**Issue**	**Status**
9	Community Electricity November 2017	Improvement of AEMO forecasts of System Load; real-time and day-ahead.	EPWA has commenced work to improve AEMO's operational forecasting that will consider this issue. The following papers have been released and are available on the Operational Forecasting Review webpage: • The Scope of Works • The Operation Forecasting Review Consultation Paper • Stakeholder submissions • Exposure Draft of ESM Amending Rules EPWA is considering stakeholder feedback on the Consultation Paper and is preparing to release an Exposure Draft on proposed Amending Rules.
10	Noel Schubert 11 February 2026	The publication of the ERA's draft BRCP determination of $491,000 for the 2028–29 Capacity Year, prompted discussion on Reserve Capacity Prices paid to Existing and Committed Generators and concerns held by Small-Use Consumer Representative with the increasing energy costs.	This issue was first raised by Noel Schubert at the 11 February 2026 MAC meeting under General Business. The issue was further discussed at • the 19 March 2026 MAC meeting under Agenda Item 6; and • at an opt in session for MAC members held on 27 May 2026. At the 30 July MAC meeting, it was agreed to add the item to the Forward Work Program.

Table 3 – Other Issues			
Id	**Submitter/Date**	**Issue**	**Status**
			Meeting papers and minutes from these meetings are available here.

Upcoming Consultations 2026/2027	Indicative Timing for publication
Consultation Paper on the Capabilities Class 2 Technologies Review	Published 4 August 2026
Consultation Paper on System Strength regulatory incentives framework and Technical Standards for hybrid systems (Power System Security and Reliability (PSSR) Standards Review)	Published 20 August 2026
Consultation on the Exposure Draft of proposed ESM Amending Rules to implement Technical Requirements for GFM/GFL (PSSR Standards Review)	Published 20 August 2026
Consultation Paper - 2026-27 Benchmark Technologies Review	August 2026
Consultation on the Non-Co-optimised Essential System Service (NCESS) Framework Review Exposure Draft of Amending Rules	September 2026
Consultation on the Exposure Draft of proposed ESM Amending Rules resulting from the Operational Forecasting Review	Published 26 August 2026
Consultation on the Exposure Draft of proposed ESM Amending Rules to implement System Strength regulatory incentives (PSSR Standards Review)	October 2026
Consultation on the Exposure Draft of proposed ESM Amending Rules resulting from the Capabilities Class 2 Technologies Review	October 2026
Consultation on the Wholesale Electricity Market (WEM) Investment Certainty Review (Renewable Energy Mechanism)	November 2026
Consultation Paper on the WEM Operation Effectiveness (large loads)	November 2026
Consultation on the Exposure Draft of proposed ESM Amending Rules to implement other System Strength changes (Proposal 20, PSSR Standards Review)	December 2026

Department of Energy and Economic Diversification
GOVERNMENT OF WESTERN AUSTRALIA

Energy Policy WA

Agenda Item 10: Overview of Rule Change Proposals (as of 27 August 2026)

Market Advisory Committee (MAC) Meeting 2026_09_03

- Changes to the report since the previous MAC meeting are shown in red font.
- The next steps and the timing for the next steps are provided for Rule Change Proposals that are currently being actively progressed by the Coordinator of Energy or the Minister.

Rule Change Proposals Commenced since the Report presented at the last MAC Meeting

None

Rule Change Proposals Awaiting Commencement

None

Rule Change Proposals Rejected since Report presented at the last MAC Meeting

None

Rule Change Proposals Awaiting Approval by the Minister

None

Formally Submitted Rule Change Proposal

None

Pre-Rule Change Proposals

None

Rule Changes Made by the Minister since Report presented at the 30 July 2026 MAC Meeting

None

Rule Change Made by the Minister and Awaiting Commencement

Gazette	Date	Title	Commencement
2023/165	12/12/2023	Wholesale Electricity Market Amendment (Reserve Capacity Reform) Rules 2023	• Schedules 2, 3 and 4 will commence at a time specified by the Minister in a notice published in the Gazette.
2024/66	7/06/2024	Wholesale Electricity Market Amendment (Cost Allocation Reform) Rules 2024	• Schedule 3 will commence at a time specified by the Minister in a notice published in the Gazette.
2025/113	26/09/2025	Wholesale Electricity Market Amendment (Supplementary Capacity No. 3) Rules 2024	• Schedule 2 will commence on 1 October 2026.
2025/3	14/01/2025	Wholesale Electricity Market Amendment (RCM Reviews Sequencing) Rules 2025	• Schedule 3 will commence 1 October 2026. • Schedule 4 will commence 1 October 2027. • Schedule 6 will commence 1 October 2027. • Schedule 7 will commence at a time specified by the Minister in a notice published in the Gazette.
2025/64	3/06/2025	Electricity System and Market Amendment (Tranche 8) Rules 2025	• Schedule 4 will commence 1 October 2026. • Schedule 5 will commence 1 October 2027. • Schedule 8 will commence 1

			October 2026. • Schedule 9 will commence at a time specified by the Minister in a notice published in the Gazette.
2025/155	23/12/2025	Electricity System and Market Amendment (Tranche 9) Rules 2025	• Schedule 3 will commence 1 October 2026 • Schedule 4 will commence 1 October 2027.