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**Sent:** Thursday, 18 August 2016 11:36  
**To:** GWCF\_Correspondence <GWCF\_Correspondence@aemo.com.au>  
**Cc:** Roger Shaw <Roger.Shaw@aemo.com.au>  
**Subject:** RE: IIR - Wholesale Market AMDQ Procedures (Victoria) 2016

An additional comment on the Wholesale Market AMDQ Procedures (Victoria) 2016 IRR.

The eligibility requirements in 6.1.2 should include a requirement to provide evidence of firm capacity similar to the clause in 2.5 regarding nominations and transfers. Another option would be an update to 2.5 to also cover injection quantities. Ownership of AMDQcc by market participants without firm capacity is contrary to the NGO. It is clear that any scenario where a holder of AMDQcc injection rights does not also hold firm injection capacity on the Interconnected Facility will result in perverse market outcomes. Non-firm injectors could use AMDQcc to be scheduled before firm injectors. This issue was identified with withdrawals from the Culcairn SWP and similar situations could arise for injections at both Culcairn and Iona.

Regards

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**From:** Hayward, Ben  
**Sent:** Tuesday, 9 August 2016 4:30 PM  
**To:** 'GWCF\_Correspondence@aemo.com.au'  
**Cc:** 'Roger Shaw'  
**Subject:** IIR - Wholesale Market AMDQ Procedures (Victoria) 2016

Hi Roger

EA supports the changes to the procedures. It's clear that AEMO's intention to commence the auction process 12 months in advance, so we are comfortable with no date being included in the procedures.

One point on clarity. In section 6, the specification of bids as an aggregate quantity instead of incremental is a little confusing. It doesn't necessarily need changing but some language needs clarification.

"(d) the aggregate of the quantities in all price steps must not exceed the total of the bidder's accredited controllable quantity at the CPP;"

- Aggregate is unclear. Could be reworded as the maximum bid quantity.

“(c) If the sum of AMDQ credit certificates under all bids does not exceed the total amount of AMDQ credit certificates available for allocation, then the available AMDQ credit certificates will be allocated to all bidders in accordance with their bid quantities, at a clearing price equal to the lowest price specified in any price step.”

- Sum under all bids should be sum of maximum bids of all bidders
- Typo in quantities

“ΣCPBQ is the sum of the incremental quantities in every price step [at or above the clearing price] for that bidder with a bid price at the clearing price; and”

- Could be reworded as bid quantity at the clearing price or use the insertion above.

Regards

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