

# WHOLESALE ELECTRICITY MARKET

## Submission to Procedure Change Proposal

**AEPC\_2017\_04**

**Certification of Reserve Capacity**

<b>Submitted by</b>	
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### Submission

Clause 2.10.7 of the Wholesale Electricity Market Rules provides that any person may make a submission for a Procedure Change Proposal (including proposals developed by AEMO, the Economic Regulation Authority or the Rule Change Panel) by completing this Procedure Change Submission form.

Submissions should be provided by email to the nominated contact in the call for submissions published with the Procedure Change Proposal.

**Please provide your views on the Procedure Change Proposal, including any objections or suggested revisions**

Alinta Energy (**Alinta**) welcomes the opportunity to provide a submission to the Australian Energy Market Operator (**AEMO**) on its *Procedure Change Proposal: Certification of Reserve Capacity (Procedure Change Proposal)*.

Alinta notes that AEMO has proposed updates to the procedure to reflect the amendments to the Wholesale Electricity Market Rules (**Market Rules**) which:

- commenced on or before 1 July 2016 (varying the process Market Participants must follow in applying for Certified Reserve Capacity and Early Certified Reserve Capacity); and
- will commence on 1 October 2017 (introducing the new Appendix 10, which details the process to determine Relevant Demand for Demand Side Programmes).

Subsequent to this Procedure Change Proposal was released for public consultation Alinta notes that, on 23 June 2017, the Minister for Energy gazetted amendments to the Market Rules detailing the certification processes for new generation facilities entering under the Generator Interim Access (**GIA**) solution. Given this, Alinta considers that the Procedure Change Proposal, as it stands, is now not consistent with the requirements of the procedure, as outlined in clause 4.9.10, or the Market Rules more broadly.

Alinta notes that the Market Rules allow AEMO to extend the normal timeframes for processing Procedure Change Proposals because of:

- issues of sufficient complexity or difficulty have been identified relating to the Procedure Change Proposal; or
- further public consultation on an issue associated with the Procedure Change Proposal is required; or
- the Procedure Change Proposal cannot be dealt with adequately without an extension because of any other special circumstance.

Given the nature of the GIA rule amendments and the potential impact on new facilities, Alinta would strongly recommend that the procedure change process be extended to allow for:

- the Procedure Change Proposal to be amended to include any GIA specific steps prior to AEMO assessing any GIA facilities for Certification of Reserve Capacity (i.e. prior to 1 October 2017); and
- stakeholders be given sufficient time to assess, and provide written submissions, on any subsequent amendments.