

WHOLESALE ELECTRICITY MARKET

Submission to Procedure Change Proposal

AEPC 2018 01

Monitoring and Reporting Protocol

Submitted by	
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Submission

Synergy welcomes the opportunity to provide feedback on the Market Procedure – Monitoring and Reporting Protocol (**Procedure**) published by Australian Energy Market Operator (**AEMO**) for public consultation.

Synergy agrees that this Procedure is developed in accordance with clause 2.15.6A of the Wholesale Electricity Market Rules (**WEM Rules**). Synergy believes that clause 2.15.6C(a) is also relevant and should be appropriately addressed in this Procedure.

Synergy considers that clause 2.15.6C(a) of the WEM Rules requires AEMO to provide details regarding "AEMO's processes... for assisting the Economic Regulation Authority in monitoring and assessing compliance" in the Monitoring Protocol.

Synergy does not consider the Monitoring Protocol meets the requirements of the clause 2.15.6C(a) and, therefore, is not consistent with the WEM Rules. Rather than specifying AEMO's "processes", the relevant section 2.2 of the Monitoring Protocol simply restates AEMO's obligations as they exist under the WEM Rules.

Synergy is of a view that AEMO should provide details on the information exchanged with the ERA and associated processes to provide transparency and promote market efficiency.