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Market Development
Australian Energy Market Operator
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Submitted via wa.marketdevelopment@aemo.com.au

Procedure Change Proposal: AEPC_2025_02 Certification of Reserve Capacity

Thank you for the opportunity to provide feedback on the proposed amendments to the WEM Procedure Certification of Reserve Capacity (CRC).

The proposed amendments update the WEM Procedure per Schedule 1 of the *RCM Reviews Sequencing Rules 2025*, which introduced a new Flexible Capacity product.

We note that the proposed amendments are intended for commencement on 14 April 2025, which coincides with the opening date for Peak CRC and Flexible CRC applications for Reserve Capacity to be provided for the 2027-28 Capacity Year.

Synergy provides the following feedback for consideration:

Procedure reference	Feedback
9.3 Assignment of Flexible Certified Reserve Capacity – Scheduled Facility or Semi-Scheduled Facility	<p>9.3 uses the maximum output determined under 9.2.1 using the parameters of the facility's nameplate capacity and four-hour ramp rate. Synergy has concerns that limiting Flexible Capacity to the facility's nameplate capacity may not properly state its real capability for several reasons:</p> <ul style="list-style-type: none">• Nameplate capacity is not a defined term in the WEM Rules and is used inconsistently, referring to different measures. For example, nameplate capacity can refer to Sent-out or As Generated capacity, MW or MVA, specified at ISO conditions [15 DegC/60%RH] or another basis, or relate to a specific operating mode. As a result, facilities may not be assessed equitably using nameplate capacity as a basis for assessment.• A facility may be capable of providing Flexible Capacity above its nameplate, for example where:<ul style="list-style-type: none">○ The nameplate capacity reflects a conservative manufacture performance guarantee and actual performance exceeded this level, or○ Operation in Peak mode, where nameplate

	<p>capacity reflects Base mode operation.</p> <ul style="list-style-type: none"> Proposed alternatives: For the purposes of certifying Flexible Capacity, it may be more accurate to rely on a facility's verified temperature curve, for example linking output to a point in the curve. This would apply to thermal generators rather than intermittent and Electric Storage Resource facilities. The overall limiting factor could be limited to Peak CRC instead of nameplate capacity.
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Thank you for your consideration of Synergy's submission. Should you have any queries regarding this submission, please contact Genevieve Teo at genevieve.teo@synergy.net.au. We otherwise look forward to the publication of the finalised Procedure.

Yours sincerely,



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