

maximum Sent Out Capacity (as proposed to be amended) to determine the Available Capacity of a Scheduled Generator; and

move the calculation of outage rates (Equivalent Planned Outage Hours, Equivalent Forced Outage Hours, Planned Outage Rate and Forced Outage Rate) from a Market Procedure to an appendix of the Market Rules.

The Rule Change Panel has also elicited feedback on:

Whether System Management should be required to ensure that the dispatch of Non-Scheduled Generators is consistent with their foreseeable constraints.

How Non-Scheduled Generator capacity should be removed from service before a Consequential Outage and returned to service after a Consequential Outage.

It highlighted that it would discuss these issues at an upcoming Market Advisory Committee meeting in February. Perth Energy is hesitant to endorse any mechanism that encourages System Management to make changes to the dispatch of energy outside the economic merit order. We highlight that mechanisms designed to manipulate the market to account for network constraints (e.g. the Generator Interim Access (GIA) tool) are inconsistent with the fundamental design of the WEM, and ultimately lead to distortion, opaqueness and inequity in market outcomes.

Cost-effective, viable alternative to determining the quantity of a Forced Outage where it is has been unable to comply with a Dispatch Instruction. Ahead of anticipated changes to the dispatch systems and process as part of the Energy Transformation Strategy, Perth Energy will continue to seek practical, operational workarounds to reduce the impact of these circumstances.

The Rule Change Panel has proposed a number of further amendments that aim to expedite the submission of outages. Perth Energy broadly supports the reporting of Outages as soon as practicable. For Forced Outages, a Rule Participant will be recording the Outage on an ex-post basis. This means that in most cases, there is no increased transparency, no ability for other Rule Participants to respond, and consequently, no impact on market outcomes. Perth Energy is concerned that more strict deadlines may therefore impose additional administrative burden on Rule Participants, with no associated benefits.

The Rule Change Panel sought views on the merits of expected cost of changes to IT systems given the expected replacement of the outage system (SMMITS) as part of the Energy Transformation Strategy. Perth Energy considers the cost should be considered in the context of the shorter payback period (especially as reduced by its estimate of the extended time taken to finalise the Rule Change Proposal, and the six-month implementation timeframe¹).

2. Please provide an assessment whether the change will better facilitate the achievement of the Wholesale Market Objectives.

Perth Energy continues to be supportive of the Rule Change Proposal, including the majority of the [Call for Further Submissions](#).

The removal of unnecessary administration, clarification of the requirements of Rule

Participants, and improved transparency of outages in the proposed revised Amending Rules will improve the overall efficiency of market operations.

We therefore consider the Rule Change Proposal as proposed to be amended in the Call for Further Submissions is broadly consistent with the Wholesale Market Objectives, and would better achieve market objectives (a) and (d) with one possible exception.

Perth Energy has not been provided sufficient detail to assess the merits o