



21 June 2023

Energy Policy WA Level 1 66 St Georges Terrace Perth WA 6000

Lodged email: energymarkets@dmirs.wa.gov.au

Dear Energy Policy WA,

RE: Review of Supplementary Reserve Capacity Provisions Stage 2 Consultation Paper





Shell Energy representatives attended the Transformation Design and Operations Working Group (TDOWG) meeting held on 15 June 2023, which provided a brief outline of each proposal contained in the Consultation Paper. During the discussion in the TDOWG, there was commentary around amending the draft Amending Rules featured in this Consultation Paper. We encourage EPWA to consider all feedback holistically and note that it becomes difficult for stakeholders to provide effective feedback when changes are proposed through various working groups during an open consultation period. Ourrently, there are several major policy framework reviews being undertaken in the WEM and as a result, we encourage EPWA to provide sufficient time for stakeholders to contribute in a meaningful way.

proposals below.

Section 2.2.2: Actual activation of services

The Consultation Paper provides feedback on a questionnaire issued by ABMO to stakeholders who participated in the 2022/2023 SRC process. In Section 2.2.2 EPWA considers that not activating a service that had previously