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– WEM AMENDING RULES EXPOSURE DRAFT

Synergy welcomes the opportunity to provide a submission on Energy Policy WA's ()'s
Cost Allocation Review WEM Amending Rules Exposure Draft ().

Please refer to Synergy's detailed comments on the CARWG Draft Rules in the table below.
Synergy thanks EPWA for their work to date in the Cost Allocation Review and looks forward
to continue working with EPWA in the implementation of the Review's outcomes.

Yours sincerely

A handwritten signature in black ink, appearing to be "Genevieve Teo", is written over a horizontal line. The line is composed of several colored segments: yellow, green, cyan, magenta, and grey.



			published 15 June 2023 ¹ included this requirement.	
5	Runway share calculation method	Appendix 2A, section 2.6	Suggest that “separate” is removed from section 2.6 for drafting clarity and consistency with 2.5 and the rest of Appendix 2A.	Suggested drafting amendments to : <u>A Market Participant that wants the separate an electricity producing unit (or set of units) within an Energy Producing System to be treated separately for the purposes of Appendix 2A must:</u> ...
6	Calculation of Regulation Shares for Regulation Cost Recovery	Appendix 2D, section 1.1	The Interpretation clause at section 1.1 could be refined for drafting clarity and consistency with the wording in Interpretation section 1 of the existing Appendix 2A, 2B and 2C.	Suggested drafting amendments to <u>If anything is to be determined, calculated or done in this Appendix, then except if otherwise stated, AEMO will determine, calculate or do that thing, as the case may be, those things.</u> ...
7	Calculation of Regulation Shares for Regulation Cost Recovery	Appendix 2D, section 2.1(g) and i	Suggest that “may” be replaced with “must” in the sentence: “in which case AEMO <i>may</i> reduce or set the Deviation value to zero for that 4-second period...” The rationale for this is if a facility is being directed or is providing ESS, then it should not be charged. For drafting clarity, we suggest that it becomes its own section, instead of being within section 2.1(g). And accordingly, (g) be amended to	Suggested drafting amendments to Scheduled Facilities and Semi-Scheduled Facilities ng di1D10.6 (D)2.6 (,)6.68 276.2

8	Calculation of Regulation Shares for Regulation Cost Recovery	Appendix 2D, section 3.3	refer to AEMO's WEM Procedure developed under section 2.1 of Appendix 2D.	
			Suggested redrafting to section 3.3 for clarity.	Suggested redrafting for A Market Participant for a Semi-Scheduled Facility that does not provide ESS or a <u>registered</u> Non-Scheduled Facility is registered may notify AEMO