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Submission in Response to ERA Public Consultation

Application for exemption from certain requirements of the Technical Rules submitted by Western Power – Newmont Mining Services

Standing

Community Electricity is:

- a. a licenced Electricity Retailer and a provider of Electricity Retail Services and Market Consultancy;
- b. a member of the Independent Market Operator's Market Advisory Committee;
- c. a member of the Economic Regulation Authority's Technical Rules Committee.

Community has no commercial interest in the matter of the application. Our commercial objectives are aligned with the Wholesale Market Objectives.

Further information is available at: www.communityelectricity.net.au

Submission

Community notes from Western Power's submission and the ERA's issues paper that:

- i) The customer wishes to increase its CMD from 13MW to 45MW, which capacity will be accessed primarily 'overnight'.
- ii) Access to the capacity will be conditional on installation of an inter-trip that will ensure the current reliability performance;
- iii) The proposed scheme has been trialled over several years;
- iv) The solution is an interim measure pending implementation of a permanent solution after 2018;
- v) The solution might lead to an increase in the WEM requirement for Load Rejection Reserve and that there is currently no means of passthrough through to the cause such a cost;
- vi) Western Power's assessment of the proposed connection arrangement shows no adverse impact on the existing level of safety or quality and reliability of supply for other network users.
- vii) The customer is the sole user impacted by the exemption and supports the application;
- viii) Western Power considers that the solution allows cost effective and timely use of otherwise unused network capacity;

On this basis, Community supports the application as being in the public interest. While we welcome the flagging of the Load Rejection Reserve issue, we suggest it is a matter for the Market Rules and as such lies outside the instant application. We would also further note that the additional overnight load created (or at least maintained) by the application is arguably beneficial for the WEM.



Contact

For further information or comment, please contact:

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