

Minutes

Meeting Title:	Market Advisory Committee (MAC)
Meeting No:	2017-07
Date:	8 November 2017
Time:	1:00 pm – 3:55 pm
Location:	Training Room No. 1, Albert Facey House 469 Wellington Street, Perth

Attendees	Class	Comment
Stephen Eliot	Chair	
Matthew Martin	Minister's Appointee – Small-Use Consumer Representative	
Martin Maticka	AEMO	
Mehdi Toufan	System Management	Proxy, from 1:10 pm
Sara O'Connor	Economic Regulation Authority (ERA) Observer	
Margaret Pyrchla	Network Operator	From 1:15 pm
Will Bargmann	Synergy	From 2:30 pm
Shane Cremin	Market Generators	
Wendy Ng	Market Generators	
Andrew Stevens	Market Generators	
Jacinda Papps	Market Generators	To 3:35 pm
Liz Aitken	Market Customers	Proxy
Simon Middleton	Market Customers	
Geoff Gaston	Market Customers	
Steve Gould	Market Customers	
Peter Huxtable	Contestable Customers	

Apologies	Class	Comment
Dean Sharafi	System Management	
Patrick Peake	Market Customers	

Also in attendance	From	Comment
Jenny Laidlaw	RCP Support	Presenter
Laura Koziol	RCP Support	Presenter
Ashwin Raj	Public Utilities Office (PUO)	Presenter, to 1.55 pm
Bobby Ditric	PUO	Observer
Aditi Varma	PUO	Observer
Justin Ashley	PUO	Observer, to 1.55 pm
Jenni Conroy	PUO	Presenter, to 1:55 pm
Paul Hynch	PUO	Observer, to 2:30 pm
Kristian Myhre	PUO	Observer, to 1.55 pm
Matthew Fairclough	AEMO	Observer, from 1:10 pm
Stuart Featham	AEMO	Observer
Ignatius Chin	Bluewaters Power	Observer
Angelina Cox	Synergy	Observer
Tim McLeod	Amanda Energy	Observer
Richard Cheng	RCP Support	Observer
Sandra Ng Wing Lit	RCP Support	Minutes

Item	Subject	Action
1	Welcome	
	The Chair opened the meeting at 1:00 pm and welcomed members and observers to MAC meeting 2017-07.	
2	Meeting Apologies/Attendance	
	The following apologies were noted:	
	Dean Sharafi (System Management)	
	Patrick Peake (Market Customers)	
	The following proxies were noted:	
	Mehdi Toufan for Dean Sharafi (System Management)	
	Liz Aitken for Patrick Peake (Market Customers)	

3	Minutes from Previous Meeting	
	The minutes of MAC meeting 2017-05 held on 13 September 2017 were circulated on 27 October 2017.	
	The minutes were accepted as a true record of the meeting.	
	Action: RCP Support to publish the minutes of meeting 2017-05 on the Rule Change Panel's website as final.	RCP Support
4	Actions Arising	
	The closed action items were taken as read.	
	Action 19/2017: Mr Matthew Martin noted that the PUO had commenced but not yet completed work to address MAC members' concerns about the amending rules Gazetted by the Minister on 30 June 2017. Mr Martin requested the action item be carried over to the next MAC meeting.	
5a	Overview of Rule Change Proposals	
	The MAC noted the Overview of Rule Change Proposals.	
6	Update on AEMO's Market Procedures	
	Mr Martin Maticka provided an update on AEMO's Market Procedures. Mr Maticka noted that:	
	the revised Market Procedure: Individual Reserve Capacity Requirements commenced on 3 November 2017;	
	AEMO was working on changes to two Market Procedures (Prudential Requirements and Capacity Credit Allocation); and	
	the Procedure Change Proposal AEPC_2017_12 (Reserve Capacity Security) was still on hold while AEMO investigated whether a Rule Change Proposal was needed to resolve an inconsistency between the Market Procedure and the Market Rules.	
7	Implementation Plan – Security Constrained Market Model	
	Mr Martin (assisted by Mr Ashwin Raj and Ms Jenni Conroy from the PUO) and Mr Maticka gave a presentation on the implementation plan for a security constrained market model for the South West interconnected system (SWIS). The presentation is available on the Rule Change Panel's website.	
	The following points were discussed.	
	 Mr Raj noted that the main driver for the PUO Networks team was the deadline to introduce legislative amendments to Parliament by mid-2018. The Networks team had been asked to focus on the minimum changes needed to support a constrained network access model, but to also consider what additional, best practice, improvements could be made to the regulatory framework. This may include adopting some aspects of Chapters 6 and 6A of the National Electricity Rules. 	

- Mr Raj that noted the PUO intended to publish a position paper in December 2017 or January 2018 outlining the design of the proposed constrained network access model. The PUO also intended to publish a consultation paper in mid-January 2018 on the data inputs and assumptions for financial modelling that would be used to understand the impacts of a transition to constrained network access on existing generators.
- In response to a question from Ms Wendy Ng, Mr Martin explained that the mid-2018 target date for the proposed legislation was designed to support completion of the required regulatory changes by mid-2020. This would provide certainty for industry, although the changes might not take effect at that time.
- In response to questions from Mr Simon Middleton and Ms Liz Aitken, Mr Raj clarified that consultation on the proposed modelling would be in two parts. The first consultation, expected to begin in mid-January 2018, would be on the assumptions and data to be used as input to the proposed modelling. This would be followed by the development of the model and then a second round of consultation on the modelling results, which was proposed to be completed by April 2018.
- Ms Aitken noted the proposed timeframe would give stakeholders only a few weeks to consider the modelling results, and asked if there was any way the PUO could bring forward the release of the modelling or the request for feedback on the input assumptions. Mr Raj replied that the PUO would do everything it could to release information for consultation earlier, to give industry as much time for review as possible. Ms Aitken suggested that anything less than a couple of months for consultation would probably be inadequate.
- Mr Andrew Stevens considered that the network access changes had a material and uncertain impact on generators, and the proposed timeframes might be unrealistic for a proper consultation process.
- In response to questions from Mr Middleton, Mr Raj confirmed that the modelling results would be used to inform Government decisions about compensation for existing Generators. Mr Raj advised that the consultation process would also cover how Capacity Credits will be assigned under the new arrangements.
- Mr Stevens noted that model of the business case for adopting a constrained network access needed to account for the existence of 1,000 MW to 1,500 MW of spare unconstrained capacity at Kwinana and Muja.
- Mr Shane Cremin suggested that the PUO consider alternative options in case the cost of moving to a constrained network access model is found to be prohibitive. There was some discussion about the benefits of implementing constrained network access, the potential short and longer-term alternatives and the need to allow adequate time for consultation.
- Mr Raj advised that the PUO intended to use a 10-year horizon for its modelling.

- Mr Martin explained that most of the PUO's market reform work would be undertaken by two teams, a dedicated Networks team and a dedicated Wholesale team. It was not intended to use a steering committee; instead policy proposals would be submitted to the Minister for consideration and approval in the normal manner.
- Mr Cremin asked whether any additional Generators would be able to connect to the SWIS before the proposed implementation of constrained network access in 2022. Mr Martin replied that the current connection processes were likely to remain in place until changes were made to the regulatory framework.
- Mrs Jacinda Papps asked whether the proposed changes included the implementation of 5-minute settlement. Ms Conroy indicated that while the proposed changes included a 5-minute dispatch cycle the PUO did not yet have a position on 5-minute settlement. Mr Maticka added that 5-minute settlement was yet to be implemented in the National Electricity Market and was unlikely to be implemented soon in the Wholesale Electricity Market (WEM).
- Mr Middleton asked what level of policy certainty the ERA would need to approve AEMO's funding for the project. Mr Maticka replied that AEMO would be looking at how its work on the reform program would be funded (e.g. whether the Government intended to underwrite the work directly, or provide a policy direction to give the ERA sufficient certainty to approve the required funding). Mr Maticka expected AEMO would only have a small team working on the reform program until there was clarity about the funding arrangements.
- Mr Ignatius Chin asked how changes to the Reserve Capacity Mechanism (RCM) would be progressed. Mr Martin replied that a separate PUO work team was looking at the options for the RCM, including whether to implement an auction or continue with some form of administered pricing mechanism. The PUO was currently seeking Ministerial approval for the project plan. The work was expected to take about eight months to complete.
- Mr Middleton asked whether there was any pressure to revise the treatment of Demand Side Programmes (DSPs) as part of the RCM work, given that the current arrangements for DSPs were only intended to be transitional and last until the implementation of an auction. Mr Martin replied that the PUO was not proposing to change the arrangements for DSPs until other changes to the RCM that affected all Market Participants (not just DSP providers) were implemented.

8 MAC Market Rules Issues List – Review of Candidate Issues

The Chair noted that RCP Support received 40 issues in response to its request for candidate issues for the proposed Market Rules Issues List. Following the circulation of the collated list on 18 October 2017, RCP Support had received three further issues for consideration, one from the Independent Market Operator (IMO) and two from the ERA.

As it was not possible to discuss all the issues in detail in a single session, RCP Support had categorised the issues into six groups:

- issues to be added to the list of potential Rule Change Proposals;
- issues that appear to require a broader review RCP Support intended to schedule preliminary discussions on these issues at upcoming MAC meetings;
- issues that RCP Support suggested should be put on hold pending the outcomes of other work currently underway;
- issues that appeared to be out of scope;
- issues that appeared to be duplicates of other issues in the list;
 and
- unclear issues requiring further explanation.

The Chair noted that the following review/discussion topics had been identified from the candidate issues, with some issues spanning multiple topics:

- the RCM (excluding its pricing mechanisms);
- behind-the-meter issues;
- the treatment of storage facilities in the WEM;
- the basis for the allocation of Market Fees;
- review of agency roles and responsibilities; and
- (potentially) Commissioning Tests.

An updated candidate issues list showing RCP Support's proposed categorisations was presented to aid the discussion. A copy of the updated list is available on the Rule Change Panel's website.

The MAC discussed and categorised each of the candidate issues and requested several action items, as summarised below.

<u>Issue 1 (Individual Reserve Capacity Requirement (IRCR)</u>
<u>calculations and capacity allocation):</u> assigned to discussion/review category.

<u>Issue 2 (Allocation of market costs):</u> assigned to discussion/review category.

<u>Issue 3 (Penalties for outage):</u> assigned to discussion/review category.

Ms Aitken raised a concern about a lack of timely information on the dynamic refund rates applicable for each Trading Interval since the implementation of the new dynamic refund regime on 1 October 2017. Mr Maticka agreed to investigate and report back to the MAC on the matter.

Action: AEMO to investigate and report to the MAC on:

(a) the timing and content of the information provided to Market Participants on dynamic refund rates under the Market Rules:

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- (b) whether the required information is currently provided in accordance with the Market Rules, and, if not, when it is expected to be; and
- (c) any options to improve the content and/or timeliness of the information provided to Market Participants on dynamic refund rates.

<u>Issue 4 (Incentives for maintaining appropriate generation mix):</u> assigned to discussion/review category.

Issue 5 (Improved definition of short run marginal cost (SRMC)) and Issue 6 (Improved definition of market power): placed on hold pending development of the ERA's proposed Balancing Market Offer Guidelines. Ms Sara O'Connor noted that the ERA was working on a market offer guideline to provide transparency on the ERA's interpretation of terms such as 'market power' and 'reasonable expectation (of SRMC)'. The ERA hoped to begin consultation (including a workshop) on the draft guideline before the end of 2017.

<u>Issue 7 (Improved definition of the quantity of LFAS i) required and ii) dispatched):</u> placed on hold pending the Minister's energy market reforms, with potential input from work on the Rule Change Proposal RC 2017 02 (Implementation of 30-Minute Balancing Gate Closure).

Issue 8 (Conduct the 3 year review of the mechanism for allocating Certified Reserve Capacity to Intermittent Generators (Relevant Level Methodology): After some discussion the MAC agreed that the Relevant Level Methodology review prescribed under the Market Rules was unlikely to address the underlying concerns that led Dr Steve Gould to submit the candidate issue. The MAC agreed to delete the issue on the basis that these underlying concerns will be raised in the relevant discussion/review sessions.

Mr Maticka queried the order in which the ERA intended to progress the periodic reviews it is required to conduct under the Market Rules (which include the Relevant Level Methodology Review). Ms O'Connor agreed with Mr Maticka that the ERA would not be able to conduct all the reviews concurrently, and advised that the ERA intended to discuss the order of progressing the reviews internally and with AEMO before providing an update on the matter to the MAC.

Action: The ERA to provide an update to the MAC on the proposed order and timing of the upcoming periodic market reviews that the ERA is required to conduct under the Market Rules.

Issue 9 (Improvement of AEMO forecasts of System Load; real-time and day-ahead): Dr Gould and Ms Aitken both raised concerns about the current quality of AEMO's load forecasts. After some discussion the MAC agreed to assign the issue to the discussion/review category and add 'forecast quality' to the list of topics for future discussion/review.

<u>Issue 10 (Review of participant and facility classes):</u> placed on hold pending the Minister's energy market reforms, with AEMO to raise any specific changes it considers would be beneficial to progress earlier as a separate issue.

ERA

<u>Issue 11 (Whole-of-system planning oversight):</u> assigned to the discussion/review category, and in particular to the review of agency roles and responsibilities.

Issue 12 (Review of institutional responsibilities): assigned to the discussion/review category, except for the sub-issue raised concerning clause 4.5.14 (which requires AEMO to document the procedure that the ERA must follow in conducting periodic reviews of the Planning Criterion and the process by which AEMO forecasts SWIS peak demand), which will be addressed as part of the Minister's changes to abolish the IMO. In response to a question from Mrs Papps, Mr Martin advised that the timing of the changes to abolish the IMO was still uncertain and dependent on the availability of Parliamentary Counsel's Office resources.

Issue 13 (Use of data for market monitoring and compliance): assigned to the potential Rule Change Proposal category, to be discussed at the next MAC meeting. Mrs Papps noted that she disagreed with the proposal and considered that information provided by Market Participants should only be used for the purpose for which it was provided.

Issue 14 (Imposition of seasonal, monthly or daily caps on capacity refunds): assigned to the potential Rule Change Proposal category, to be discussed at the next MAC meeting.

<u>Issue 15 (Changes to the rules for approving Planned Outage extensions):</u> placed on hold pending the progression of the Rule Change Proposal RC_2013_15 (Outage Planning Phase 2 – Outage Process Refinements), which includes proposed amendments related to this issue.

Mr Martin noted that the scope of the Minister's energy market reforms was not expected to include material changes to the WEM outage provisions, and so should not prevent the progression of RC_2013_15 by the Rule Change Panel on a business-as-usual basis. Ms Jenny Laidlaw noted the Rule Change Panel had not yet assigned an urgency rating to RC_2013_15, due to uncertainty about its interdependencies with the Minister's reform program. Ms Laidlaw requested the views of MAC members and observers on the appropriate urgency rating for the proposal.

Action: MAC members and observers to send their suggested urgency ratings for RC_2013_15 (Outage Planning Phase 2 – Outage Process Refinements) by email to RCP Support by 5:00 pm on Wednesday, 15 November 2017.

Issue 16 (Requirement for behind-the-meter generation to pay their fair share of network costs, market fees and ancillary service charges): assigned to discussion/review category.

Issue 17 (Retrospective logging of Forced Outages after the 15 day deadline): There was general support from MAC members to address the issue if possible as part of the Rule Change Proposal RC_2014_03 (Administrative Improvements to the Outage Process). The MAC agreed to place the issue on hold pending the progression of RC_2014_03.

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There was some discussion about how the late logging of a Forced Outage for a Scheduled Generator would flow through to the settlement adjustment process, and in particular how it would affect the generator's capacity refunds and constrained off payments. Ms Laidlaw considered that additional changes were likely to be needed to ensure the correct settlement adjustment outcome. Mr Maticka agreed to investigate what would be the simplest and cheapest option to achieve the desired result (i.e. the correct payment of capacity refunds and the recovery of any unwarranted constrained off compensation).

Action: AEMO to investigate and report back to the MAC on the simplest and cheapest option for changes to ensure that the late logging of a Forced Outage by a Generator would result in the appropriate settlement adjustment outcomes (i.e. correct payment of capacity refunds and the recovery of any unwarranted constrained off compensation).

<u>Issue 18 (Changes to the Spinning Reserve procurement process):</u> assigned to the potential Rule Change Proposal category, to be discussed at the next MAC meeting.

Issue 19 (Conduct a review of the margin values evaluation process and propose rule changes to address any identified deficiencies): placed on hold pending the Minister's energy market reforms.

Mr Chin suggested that it should be possible to improve the transparency of the margin values determination process, even if more material changes were dependent on the Minister's reform program. Mr Maticka and Ms O'Connor agreed to take Mr Chin's suggestion into account in future margin value reviews.

Issue 20 (Changes to the Spinning Reserve cost allocation model): assigned to the potential Rule Change Proposal category, to be discussed at the next MAC meeting.

Ms Laidlaw noted that both the IMO and the Electricity Market Review had recommended the implementation of a full runway model for Spinning Reserve cost recovery, and asked whether it would be feasible to implement the full runway model in advance of the Minister's other energy market reforms. Mr Maticka replied that this was feasible, but questioned who would take responsibility for developing the Rule Change Proposal. Mr Maticka, Mr Stevens and Mr Cremin all expressed support for the full runway model.

Issue 21 (consideration of one-off events in the determination of Credit Limits): The MAC agreed to delete the issue on the basis that it relates to a Market Procedure rather than the Market Rules, and recommended that Bluewaters discuss the matter directly with AEMO (the responsible procedure administrator).

Issue 22 (Amendments to the determination of Credit Limits to better account for prepayments): Mr Chin noted that AEMO recently advised stakeholders of its plan to undertake a review of the Credit Limit determination methodology following completion of its current work to improve the accuracy of the Outstanding Amount calculation. Mr Maticka confirmed that this was AEMO's intention and

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recommended incorporating this issue into AEMO's review, which was expected to begin in the first half of 2018.

The MAC agreed to place the issue on hold pending AEMO's proposed review of the process for Credit Limit determination.

<u>Issue 23 (Review of Market Fees structure including the cost recovery mechanism for a reform program):</u> assigned to the discussion/review category.

<u>Issue 24 (Simplify the Wholesale Market Objective to a single statement):</u> The MAC agreed to delete the issue on the basis that it was a policy issue involving changes to the Electricity Industry Act.

Issue 25 (Publish a guidance as to how the Wholesale Market Objective(s) are to be applied by the Rule Change Panel): There was some discussion about the difficulty of assigning a priority order to the objectives (e.g. whether efficiency was more or less important than reliability) and the role of the Rule Change Panel as a panel of experts, able to exercise discretion in its decisions on Rule Change Proposals. The Chair questioned what could usefully be included in a guideline, apart from a ranking of the Wholesale Market Objectives that would need to be provided by the Minister. The MAC agreed to delete the issue.

Issue 26 (A more flexible, less narrow definition as to what can constitute a fast track Rule Change Proposal): In response to a request for clarification from Ms Laidlaw, Mr Middleton suggested it may be beneficial to introduce a third rule change process, with a duration falling between the current standard and fast track processes. There was some discussion about the fast track criteria and the changing preferences of the MAC over time with regard to the use of the Fast Track Rule Change Process. The MAC agreed to delete the issue.

Mr Chin asked Ms Laidlaw about a new fast track process discussed by the Energy Market Operations and Processes (EMOP) Consultation Group in 2016. Ms Laidlaw did not think the proposed process had applied to rule changes but agreed to report back to the MAC with details of the proposed process.

Action: RCP Support to provide an update to the MAC on the new fast track process discussed by the EMOP Consultation Group in 2016.

Issue 27 (Review what should constitute a Protected Provision): Mr Middleton noted that while he did not have any specific concerns, he questioned what the criteria should be for making a provision a Protected Provision. It was agreed that following the recent changes to institutional arrangements in the WEM there may be some provisions that no longer need to be protected (e.g. that relate purely to functions of AEMO).

Mr Martin advised that the PUO would review the current Protected Provisions to identify if there were any that no longer needed to be classified as such. The MAC agreed to place the issue on hold pending the outcome of the PUO's review.

RCP Support Action: The PUO to review the current list of Protected Provisions in the Market Rules to determine if any of the provisions no longer need to be Protected Provisions.

Issue 28 (Appropriate rule changes to allow battery storage to be considered under the Market Rules): assigned to the discussion/review category.

Issue 29 (Provide greater clarity on the respective roles and responsibilities for each regulatory body): assigned to the discussion/review category.

<u>Issue 30 (Review of Market Rules relating to Reserve Capacity Requirements and Reserve Capacity capability criteria):</u> assigned to the discussion/review category.

<u>Issue 31 (LFAS Report – unnecessary obligations under clauses 7A.2.9(b) and (c)):</u> assigned to the potential Rule Change Proposal category, to be discussed at the next MAC meeting.

<u>Issue 32 (Commissioning Tests):</u> The MAC agreed to delete the issue as it was covered by issue 39.

<u>Issue 33 (Logging of Forced Outages):</u> There was general support from the MAC to incorporate this change (to allow Forced Outage details to be amended after their initial entry) into the Rule Change Proposal RC_2014_03. The MAC agreed to place the issue on hold pending the progression of RC_2014_03.

<u>Issue 34 (Applications to extend Planned Outages):</u> The MAC agreed to delete the issue as it was covered by issue 15.

<u>Issue 35 (Behind-the-meter generation and apportionment of Market Fees, ancillary services costs, etc.):</u> assigned to the discussion/review category.

<u>Issue 36 (Capacity Refund arrangement):</u> The MAC agreed to delete the issue as it was covered by issue 14.

Issue 37 (Spinning Reserve costs): After some discussion about the inherent volatility of Spinning Reserve costs the MAC agreed to delete the issue. Mr Maticka offered to investigate what simple options might exist to improve the accessibility and timeliness of the information provided to Market Participants on LFAS and Spinning Reserve costs.

Action: AEMO to investigate what simple options might exist to improve the accessibility and timeliness of the information provided to Market Participants on LFAS and Spinning Reserve costs.

<u>Issue 38 (How Spinning Reserve costs are apportioned):</u> The MAC agreed to delete the issue as it was covered by issue 20.

<u>Issue 39 (Commissioning Test Process):</u> assigned to the discussion/review category.

<u>Issue 40 (Market Power mitigation arrangements):</u> The MAC agreed to delete the issue as Alinta intended to liaise directly with the PUO regarding Alinta's proposal.

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Issue 41 (Issue relating to the Energy Review Board's recent decision regarding the IMO's Application No. 1 of 2016 against Vinalco): There was general agreement that the preferred long-term solutions to the problems identified during the Vinalco investigation would need to be progressed by the Minister as part of his network and energy market reform program. However, there was some discussion about potential short-term solutions, including clarification of the interpretation of the SRMC provisions in situations where a Generator is constrained on for an extended period. The MAC agreed to place the issue on hold pending the development of the ERA's proposed Balancing Market Offer Guidelines.

Issue 42 (Ancillary Service approvals process): placed on hold pending the Minister's energy market reforms.

Issue 43 (SRMC investigation process): assigned to the potential Rule Change Proposal category, to be discussed at the next MAC meetina.

Action: RCP Support to schedule a discussion of the issues identified as potential Rule Change Proposals on the agenda for the December 2017 MAC meeting.

Action: RCP Support to schedule preliminary MAC discussions covering the following topics:

- behind-the-meter issues;
- the treatment of storage facilities in the WEM;
- the basis for the allocation of Market Fees:

the RCM (excluding its pricing mechanisms);

- review of agency roles and responsibilities;
- Commissioning Tests; and
- forecast quality.

8 **General Business**

Approval to disband Procedure Change Working Groups

The Chair noted that the MAC had decided in a previous meeting to replace the IMO Procedure Change and Development Working Group (IMOPWG) and the System Management Procedure Change and Development Working Group (SMPWG) with a new Working Group called the AEMO Procedure Change Working Group (APCWG). The old Working Groups were to be disbanded once their names were removed from the Market Procedure: Procedure Administration (Administration Procedure).

As the necessary amendments to the Administration Procedure were now complete, the MAC agreed to disband the IMOPWG and SMPWG.

Manifest error in calculation of New Notional Wholesale Meter (Step 5A of Appendix 5)

Ms Laidlaw noted that Step 5A of Appendix 5 of the Market Rules sets out the calculation of the IRCR contribution of the New Notional Wholesale Meter, which is intended to account for new non-interval

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RCP Support meters that have been registered since the previous Hot Season. The step was introduced by the Rule Change Proposal RC_2008_32 (Calculation of IRCR) to ensure that new non-interval meters received equivalent treatment to new interval meters in the IRCR calculations.

Any new interval meter that is not registered in the previous Hot Season but is registered by the end of month n-3 is included in the IRCR calculations for month n. While RC_2008_32 sought an equivalent outcome for non-interval meters, Ms Laidlaw considered that Step 5A did not achieve this, as it only considered the non-interval meter growth over a single Trading Month instead of the actual number of months between the end of the relevant Hot Season and month n-3 (i.e. between 4 and 15 months). The current calculation appears to greatly underestimate the actual size of the New Notional Wholesale Meter.

Ms Laidlaw sought the views of MAC members on whether they considered this constituted a manifest error in the Market Rules or, alternatively, why the calculation only considered non-interval meter growth for a single month.

Action: MAC members and observers to send their views on whether the failure of Step 5A of Appendix 5 of the Market Rules to consider non-interval meter growth over all the months since the relevant Hot Season up to month n-3 is a manifest error in the Market Rules (and if not why) by email to RCP Support by 5:00 pm on Wednesday, 15 November 2017.

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The meeting closed at 3:55 pm.