

Minutes

Meeting Title:	Market Advisory Committee (MAC)
Date:	30 April 2019
Time:	09:30 AM – 11:05 AM
Location:	Training Room No. 2, Albert Facey House 469 Wellington Street, Perth

Attendees	Class	Comment
Stephen Eliot	Chair	
Matthew Martin	Minister's Appointee – Small-Use Consumer Representative	
Martin Maticka	Australian Energy Market Operator (AEMO)	
Dean Sharafi	System Management	
Sara O'Connor	Economic Regulation Authority (ERA) Observer	
Andrew Everett	Synergy	
Kei Sukmadjaja	Network Operator	Proxy for Margaret Pyrchla
Jacinda Papps	Market Generators	
Daniel Kurz	Market Generators	
Patrick Peake	Market Customers	
Geoff Gaston	Market Customers	
Peter Huxtable	Contestable Customers	

Apologies	Class	Comment
Margaret Pyrchla	Network Operator	
Wendy Ng	Market Generators	

Also in attendance	From	Comment
Jenny Laidlaw	RCP Support	Minutes
Aden Barker	Public Utilities Office (PUO)	Presenter to 10:10 AM
Matt Shahnazari	ERA	Observer from 10:05 AM
Rajat Sarawat	ERA	Observer from 9:40 AM

Oscar Carlberg	Synergy	Observer
Dimitri Lorenzo	Bluewaters Power	Observer
Matthew Bowen	Jackson McDonald	Observer
Chayan Thananchayan	Kleenheat	Observer
Tim McLeod	Amanda Energy	Observer
Scott Davis	Australian Energy Council	Observer
Natalie Robins	RCP Support	Observer
Sandra Ng Wing Lit	RCP Support	Observer

Item	Subject	Action

1 Welcome

The Chair opened the meeting at 9:30 AM and welcomed members and observers to the 30 April 2019 MAC meeting.

The Chair:

- welcomed the new and re-appointed members to the MAC:
 Mrs Jacinda Papps, Ms Wendy Ng, Mr Daniel Kurz,
 Mr Geoff Gaston, Mr Patrick Peake, and Mr Peter Huxtable;
- farewelled former members Mr Shane Cremin and Dr Steve Gould:
- noted that there are now two vacant Market Customer representative positions, and that the Rule Change Panel (Panel) is running a process to fill these positions; and
- noted that Mr Will Bargmann has retired from the MAC and that Synergy has appointed Mr Andrew Everett in his place.

2 Meeting Apologies/Attendance

The Chair noted the attendance as listed above.

3 Minutes from Previous Meeting

Draft minutes of the MAC meeting held on 5 February 2019 were circulated on 25 February 2019. The Chair noted that a revised draft showing tracked changes suggested by Mr Ben Williams was distributed in the meeting papers.

Subject to these changes, the MAC accepted the minutes as a true and accurate record of the meeting.

Action: RCP Support to amend the minutes of the 5 February 2019 meeting to reflect the agreed changes and publish them on the Rule Change Panel's website as final.

RCP Support

4 Action Items

The closed action items were taken as read.

Actions 19/2017 and 33/2017: The Chair noted that action items 19/2017 and 33/2017 were to be progressed as part of the Wholesale Electricity Market (WEM) Reform Program; and questioned whether they should be moved from the action item list to the MAC Market Rules Issues List (Issues List). MAC members agreed to move the two issues to the Issues List. Mrs Papps requested that RCP Support update the description of the issue in action item 19/2017 to include more detail (e.g. the relevant Market Rules clause references).

Action 2/2019: Mr Martin Maticka provided a clarification of the IT cost estimates provided by AEMO to RCP Support in 2018 and to the MAC on 5 February 2019 to support the recalculation of Theoretical Energy Schedules (TES) after the current 15 Business Day deadline. Mr Maticka advised that the original estimate provided to RCP Support included costs for regression testing that were not included in the quote provided to the MAC. Mr Maticka considered that the original quote would be accurate if the TES changes were made in isolation, but if the changes were made in conjunction with other changes that also required a full regression test then the incremental cost would be quite small.

5 MAC Market Rules Issues List

The MAC noted the recent updates to the Issues List.

New Issues:

The Chair noted that the issues in action items 19/2017 and 33/2017 would be included in the Table 4 (Issues on Hold) of the Issues List.

<u>Issue 53:</u>

The MAC recommended that a Low urgency rating be assigned to new issue 53 (TES Recalculation).

<u>Issues 5, 6 and 41:</u>

The Chair sought the views of MAC members on whether the 'Guideline to inform Balancing Market offers' (**Guidelines**) published by the ERA on 22 February 2019 had addressed the Issues List issues 5 (Improved definition of SRMC), 6 (Improved definition of Market Power) and 41.

Mrs Papps considered that submissions on the draft Guidelines indicated that many Market Participants did not agree with the interpretation of market power in the document. Mr Everett

agreed, considering that many of the submissions had questioned some of the interpretations in the draft Guidelines and the ERA had not embraced those views.

Mr Rajat Sarawat noted that the Guidelines are clearly non-binding and are not intended to be an extension of the Market Rules. Mr Sarawat noted that the ERA had taken submissions into account when finalising the Guidelines.

The MAC agreed that it did not need to undertake further work on issues 5, 6 and 41 in the context of developing Rule Change Proposals, and therefore the issues should be closed.

Issue 52:

The Chair noted that issue 52 (how should potential future scenarios be managed where multiple generating units that are connected to the same line constitute the largest credible contingency, without imposing excessive constraint payment costs on Market Customers) had been included in the Issues List, as agreed at the 5 February 2019 MAC meeting.

Mr Dean Sharafi considered that although the issue had been placed on hold pending the outcomes of the WEM Reform Program, it should be discussed at an upcoming MAC meeting because the problem was expected to materialise in 2020, well before the completion of the WEM Reform Program.

Mr Matthew Martin confirmed that the PUO planned to address the issue as part of the WEM Reform Program but acknowledged that stakeholders might wish to take earlier action. Mrs Papps questioned whether the issue would be considered by the Power System Operation Working Group (**PSOWG**) and a solution implemented prior to October 2022.

Mr Sharafi noted that largest single contingency could be up to 550 MW. Ms Laidlaw considered the main issue was whether System Management should activate more Spinning Reserve or constrain generation in these situations, and if the latter option was taken, what compensation should be paid to the constrained generators. Mr Everett expressed concern that at times of low demand there may not be room to enable enough plant to provide such high levels of Spinning Reserve.

There was some discussion about what actions System Management was empowered to take under the current Market Rules, and specifically how much Spinning Reserve it could activate in different situations.

Mr Patrick Peake considered the Technical Rules should be reviewed to prevent the connection of multiple generators on a single line without consideration of the Spinning Reserve cost implications. Mr Sharafi suggested there were multiple solutions

to the problem, such as upgrading the network to reduce the size of the contingency, and other market options that would affect Market Participants. Mr Sharafi reiterated his view that the MAC should discuss these options.

The Chair noted that while he was happy for the MAC to be a venue to discuss the issue, RCP Support could not lead the analysis of options. There was some discussion about preparing for a MAC discussion of the issue, and the likely timing of the PUO's work on the issue.

The MAC agreed to include a discussion of the issue on the agenda for its 11 June 2019 meeting; and for RCP Support and AEMO to work together to prepare some slides to help guide that discussion.

Issue 35:

Mr Peake noted his understanding that the Minister had commenced work on 'behind-the-meter' issues and flagged Issues List issue 35 (BTM generation and apportionment of Market Fees, ancillary services, etc) for consideration as part of that work.

Action: RCP Support to schedule a discussion of MAC Market Rules Issues List issue 52 (multiple generators on a single line forming the largest single contingency in the SWIS); and develop a presentation with AEMO to guide that discussion.

RCP Support/ AEMO

6 Update on the Network and Market Reform Program

Mr Aden Barker provided the following updates on the WEM Reform Program.

- The PUO expected to hold the next meeting of the Market Design and Operation Working Group (MDOWG) in early June 2019, focusing on ancillary service procurement. While the PUO had originally intended to hold an earlier meeting to discuss the relevant principles and options, it had since decided it would be better to delay the meeting to be able to present more concrete proposals for stakeholder comment.
- The release of a consultation paper on scheduling and dispatch had been delayed, in part following a request by the Minister. The PUO was working internally to scope the two major initiatives recently announced by the Minister (the Whole of System Plan and the Distributed Energy Resource (DER) Roadmap) and to ensure that the work being

conducted under the WEM Reform Program was properly integrated with those projects.

- The proposed information sheet for Market Participants discussed at the previous WA Electricity Consultative Forum (WAECF) was likely to be slightly expanded, due in part to the limits on the information that the PUO can readily access from AEMO. The PUO was working with AEMO to develop the information sheet, to distribute the information sheet to Market Participants, and to manage handling the information thereafter.
- The PUO was continuing to work with AEMO and Western Power on the regulatory architecture for power system security and reliability. This includes the way matters such as the Frequency Operating Standards and generator performance standards might evolve going forward by way of enforcement, monitoring, and change management processes; and whether the current placement of those various requirements in the Technical Rules and Market Rules is working. The PUO expected to develop a proposal for Government over the next few months.
- Participation and registration of storage in the WEM was
 discussed at length during the 12 March 2019 MDOWG
 meeting. The PUO was continuing discussions with AEMO
 on the content of the information sheets that are to be
 published by AEMO to provide clarity to industry on the
 requirements for storage participation in the WEM. Mr
 Barker reiterated the benefits of Market Participants
 engaging with Western Power as early as possible
 regarding their potential storage projects.
- In relation to network reform, the PUO was continuing to work with Western Power, providing advice on options for implementation of constrained network access.

In response to a question from Mr Sharafi, Mr Barker clarified that the inclusion of generator performance standards in the Market Rules was one of the options being considered by the PUO. Mr Barker noted that the current Technical Rules and Market Rules did not reflect the recent transfer of system management functions from Western Power to AEMO. This transfer had occurred during the Electricity Market Review, at a time when it was envisaged that many of the issues under consideration would be resolved by the proposed move to the national framework for network regulation. Work was now required to align the relevant functions and ensure that obligations are imposed in the correct places and appropriate monitoring systems are in place.

Mr Barker noted that the PUO intended to consult with generators regarding how generator performance standards are to be imposed going forward.

Mr Martin noted that the PUO received seven sets of comments on the draft rule amendments for the Minister's Reserve Capacity Mechanism (**RCM**) pricing reforms. The PUO was working with its lawyers on any actions needed to address those comments and intended to complete that process later in the week. The PUO planned to discuss any changes with the parties who had provided comments; and then publish the updated rules and a document outlining the comments received and changes made, before seeking signoff on the final rules from the Minister. The PUO was working towards a revised target date of 1 June 2019.

In response to a question from Mr Kurz, Mr Martin confirmed that the certification window for the 2019 Reserve Capacity Cycle would still open on 1 May 2019.

Mr Sharafi advised that the next PSOWG meeting was planned for mid-to-end May 2019. AEMO was currently putting together some material for that meeting and working on the agenda with the PUO.

7 AEMO Procedure Change Working Group (APCWG) Update

Mr Maticka advised the MAC that the next APCWG meeting was scheduled for 2 May 2019. The agenda included changes to several Market Procedures resulting from the Rule Change Proposal: Removal of Resource Plans and Dispatchable Loads (RC 2014 06).

Mr Maticka noted that AEMO received no submissions regarding the procedure changes (AEPC_2019_03) to support the Rule Change Proposal RC_2017_06: Reduction of prudential exposure in the Reserve Capacity Mechanism. AEMO aimed to publish the Procedure Change Report at the end of April 2019.

The MAC noted the update on AEMO's Market Procedures.

8(a) Overview of Rule Change Proposals

The Chair noted the following:

- The Final Rule Change Reports for Rule Change Proposal RC_2018_06: Full Runway Allocation of Spinning Reserve Costs; and RC_2018_07: Removal of constrained off compensation for Outages of network equipment were due to be published that morning (30 April 2019).
- RCP Support intended to hold a workshop in June 2019 on Rule Change Proposal RC 2017 02: Implementation of

30-Minute Balancing Gate Closure. The purpose of the workshop is to discuss the two options for reduced gate closure (90-minute and 60-minute) that appear to be technically feasible based on information provided by AEMO; and what issues need to be considered and what analysis needs to be undertaken to progress the proposal.

 The Panel had received a Rule Change Proposal from Enel X relating to changes to the Relevant Demand calculation. If the Rule Change Proposal was progressed, then the first submission period would be extended to allow discussion of the proposal at the next MAC meeting on 11 June 2019.

In response to a question from Ms Laidlaw, several MAC members expressed interest in attending a drafting review workshop in June 2019 for the Rule Change Proposal RC_2013_15: Outage Planning Phase 2 – Outage Process Refinements.

The MAC noted the overview of Rule Change Proposals.

8(b) Pre-Rule Change Discussion on Capacity Valuation for Intermittent Generators

Ms Sara O'Connor presented the ERA's recommendations from its recent review of the Relevant Level Methodology and consulted with the MAC about the ERA's intention to develop a Rule Change Proposal to implement those recommendations. A copy of the ERA's presentation is available on the Panel's website.

The following points were discussed.

- Ms O'Connor noted the ERA's recommendation to include the details of the methodology in a Market Procedure and sought feedback from the MAC on which agency should have responsibility for that Market Procedure. Ms Laidlaw noted that usually the agency responsible for the operation of a process was responsible for the development of the Market Procedure.
- Mr Sharafi noted that AEMO was yet to be satisfied that the
 proposed methodology would not adversely affect power
 system reliability by failing to ensure there was enough
 capacity to meet a one-in-ten-year peak demand event.
 Dr Matt Shahnazari explained that the proposed model was
 based on the Planning Criterion and a loss of load
 expectation of one day out of ten years. There was some
 discussion about how the model worked and how the ERA
 proposed to determine a single effective load carrying

capability (**ELCC**) value for the intermittent fleet using sample data from multiple years.

- Mr Maticka noted that the current method was a simple process and suggested that the proposed method would be more expensive to administer. Mr Maticka questioned whether the added value of the proposed method would be worth the additional development and administrative costs. Ms O'Connor replied that the ERA had been able to create a model at low cost. Dr Shahnazari noted that the model was technically quite simple and had already been replicated by at least one stakeholder. Dr Shahnazari also considered that the additional computational cost burden was negligible because the ERA would be required to develop and run the same model to calculate accurate values for the K parameter under the current method.
- Mr Peake asked whether System Management would use a similar probabilistic model to forecast Intermittent Generator output for PASA reserve margin calculations. Mr Peake considered it was problematic if different methods were used to forecast Intermittent Generator output for certification and outage scheduling.

Mr Maticka considered this was a good point that probably should be investigated. Dr Shahnazari agreed, noting that the ERA discussed the effect of scheduled maintenance on capacity values in the technical appendix to its final report.

Dr Shahnazari considered that scheduled maintenance could usually be ignored in a system adequacy assessment model under the assumption that maintenance would be undertaken when the system was not under pressure. However, this assumption depended on there being enough spare capacity available to allow for scheduled maintenance. The ERA was likely to consider the effect of scheduled maintenance and its potential effects on system adequacy in its next review of the Relevant Level Methodology.

Ms O'Connor noted that the ERA intended to confirm its assumption that scheduled maintenance was not an immediate concern during the development of the Rule Change Proposal.

 Ms O'Connor noted that conflicts existed between the proposed and current Relevant Level Methodologies and the rules for early certification of Reserve Capacity and conditional certification of Reserve Capacity. Ms O'Connor sought the views of the MAC as to whether these conflicts

should be addressed as part of the ERA's Rule Change Proposal.

Ms Laidlaw noted the concern was that the proposed methodology could not be used to assign a specific number of Capacity Credits for a Capacity Year before the normal certification process for that Capacity Year. Ms Laidlaw suggested that the Minister's RCM pricing reforms and the proposed approach to certification under a constrained network access regime were also likely to likely conflict with the early or conditional certification of Reserve Capacity for new Intermittent Generators.

Ms O'Connor suggested that the concepts of early and conditional certification could be removed altogether from the Market Rules. Ms Laidlaw questioned whether the concepts were still required. There was some discussion about when and whether the provisions had been used, with Mr Maticka confirming that at most their use was rare.

Mr Maticka advised against the ERA expanding the scope of its Rule Change Proposal to address the problems with early and conditional certification. Mr Maticka suggested that the problems could be considered to be manifest errors in the Market Rules.

Ms Laidlaw questioned whether in future Facilities with long lead times (which might benefit from the early and conditional certification options) were likely to be built in the WEM. Mrs Papps noted that certification and the assignment of Capacity Credits has been delayed for several years; and questioned whether certification should be moved closer to the Capacity Year on a permanent basis. Mr Maticka considered that, while a one-year lead time is not a problem in times of excess capacity, it may not be enough to support generators with longer development times or the need to build supporting network infrastructure.

Mrs Papps agreed with Mr Maticka that the issue around early and conditional certification should be addressed separately from the ERA's Rule Change Proposal. Mr Maticka suggested that the issue be added to the Issues List or, if there was agreement that the problem was a manifest error, addressed through a Rule Change Proposal developed by the Panel. The Chair expressed some doubt as to whether the problem was a manifest error in the Market Rules.

Dr Shahnazari considered it might be possible to support the early certification of Intermittent Generators by assigning them a preliminary, conservative minimum

certification value that was subject to later revision. However, whether early and conditional certification were useful options in the Market Rules was a separate question. Dr Natalie Robins noted that the technical appendix of the ERA's final report included information on how other jurisdictions dealt with new plant entering the market.

The MAC agreed to include the problems relating to early and conditional certification of Intermittent Generators on the Issues List.

- Ms O'Connor noted that the ERA developed its proposed Relevant Level Methodology on the understanding that the capacity values calculation would then feed into a constrained network access-based capacity allocation. This approach, which was based on advice in the PUO's consultation paper "Allocation of capacity credits in a constrained network", was not necessarily the approach taken in other jurisdictions.
- There was some discussion about the dependence of the methodology on assumptions about which generators would be operating and the extent to which they would be able to generate concurrently under the likely network constraints.
 Dr Shahnazari considered that any problem with the proposed methodology was also a problem with the current methodology, because similar assumptions were needed to calculate a value for the K parameter.
- Ms O'Connor advised that the ERA intended to hold its annual energy markets workshop on 16 May 2019 and would be happy to continue discussion about the Rule Change Proposal at that workshop. Ms O'Connor noted that the ERA would proceed with the development of the Rule Change Proposal and would provide the MAC with some cost details before formally submitting the Rule Change Proposal.
- Ms O'Connor asked if the MAC required any further information, or if there were any other ways that the MAC wished to be consulted about the proposal before its formal submission into the rule change process. Mr Oscar Carlberg asked whether the proposed methodology was more sensitive to changes to which Scheduled Generators were operating in the WEM, and if so whether it would be possible to get some information about that sensitivity.

Ms O'Connor replied that under the proposed methodology (and other methodologies) the capacity value of a generator depended on the condition of the system, including what other generators existed in the system. If many generators

Action Item Subject

> enter or exit the market the effects may be significant. Ms O'Connor advised that the ERA can provide additional scenarios to demonstrate the sensitivity, but also noted that the proposed use of a rolling average ELCC value over 10 years instead of a median value would help to mitigate such sensitivities. Dr Shahnazari noted the model needed to show some sensitivity to such changes because excessive mitigation could risk system reliability.

> Ms O'Connor agreed to develop some additional scenarios for presentation to the MAC in advance of finalising the Rule Change Proposal.

Action: RCP Support to include the conflict between the current and proposed Relevant Level Methodologies and the early and conditional certification of new Intermittent Generators in the MAC Market Rules Issues List.

RCP Support

Action: The ERA to provide an update to the MAC regarding the expected costs for its proposed changes to the

Relevant Level Methodology.

ERA

ERA

Action: The ERA to give a presentation to the MAC demonstrating the sensitivity of the proposed Relevant Level Methodology in the WEM to the entry and exit of Scheduled Generators.

9 Conflict of Interest Considerations

The Chair noted that during the Panel's consideration of the Rule Change Proposal RC 2018 05: ERA access to market information and SRMC investigation process, some questions were raised about the Panel's consideration of a Rule Change Proposal put forward by the ERA. The Chair advised that the Draft Rule Change Report for RC 2018 05 contained discussion to address those issues. However, the Panel also asked RCP Support to put the matter before the MAC once again.

The Chair took the agenda item paper as read and asked MAC members and observers whether they had any remaining concerns with the arrangements in place to manage potential conflicts of interest where the Panel processes Rule Change Proposals submitted by the ERA. The following points were discussed.

Mrs Papps sought clarification of the dotted line linking the Executive Officer and the Energy Markets division in the corporate structure diagram on page 59 of the meeting papers. Mrs Papps noted that the line was not present in

the corresponding diagram on page 52. The Chair and Mr Sarawat explained that the line represented the administrative resourcing arrangements for RCP Support, in that the Executive Officer liaised with the Manager of the Energy Markets division to obtain the resources needed to support the Panel.

• Mrs Papps asked whether staff from the RCP Support, Strategic Projects, Market Regulation and Compliance teams were switched from one team to another as resourcing needs require. Mr Sarawat replied that staff could be moved from one team to another to meet resourcing demands, but the work of each team remained distinct.

Dr Robins noted that she previously worked in the Market Regulation team and reported to Ms O'Connor and Mr Sarawat but had recently moved to RCP Support where she reported to Ms Laidlaw and the Chair. Dr Robins clarified that she was not involved in the processing of any Rule Change Proposals developed by the ERA, due to the potential conflict of interest.

Mrs Papps indicated her concern related more to staff from Market Regulation switching to Compliance, if those staff had access to data and information from some of the broader reviews undertaken by the Market Regulation team. Mr Sarawat noted that the ERA used the data it received in accordance with the Market Rules, and it would be a breach of the Market Rules to use data for a purpose that is not allowed by the Market Rules.

- Mr Peake clarified that Perth Energy did not actually raise allegations of conflict of interest in its submission on RC_2018_05 but had expressed concerns about the appearance of the arrangement.
- In response to a question from Mr Maticka, Mr Sarawat advised that there were currently 19 staff working in the Energy Markets division (including RCP Support).
- Mrs Papps asked about the line connecting the Executive Officer and the ERA's Chief Executive Officer (CEO) in the corporate structure diagram on page 59, noting that this line was not included in the diagram on page 52. Mr Sarawat explained that the Executive Officer was hired by the CEO and was an employee of the ERA. The Chair noted that he did not report to the CEO and considered the line should not be included in the diagram.

Item	Subject	Action
	In response to a question from Mr Huxtable, the Chair clarified that his performance agreement was with the Panel, and the performance agreements of RCP Support staff were with him.	
	 In response to an invitation from the Chair, MAC members and observers did not identify any issues with the arrangements that they wished to raise with the Panel or the governing body of the ERA. 	
	Action: The ERA to update its website to correct any discrepancies in the diagrams indicating the reporting arrangements between the Executive Officer, RCP Support and the ERA.	ERA
10	AEMO Allowable Revenue (AR5) Process	
	Ms O'Connor noted that the ERA was reviewing AEMO's AR5 proposal and had requested some additional data, which AEMO was providing. The ERA intended to publish a draft decision either late in week ending 3 May 2019 or early the following week, for a four-week consultation period. The final report was due on 14 June 2019.	
	Ms O'Connor thanked stakeholders who had provided submissions on the Issues Paper published by the ERA.	
11	General Business	

The meeting closed at 11:05 AM.

No general business was discussed.