

Our Ref: DM# 21706570
Enquiries: Jo-Anne Chan
Telephone: (08) 6282 7429

7 November 2019

Rule Change Panel
Attn: Executive Officer
PO Box 8469
PERTH BC WA 6849

Via email: Support@rcpwa.com.au

Dear Stephen

PROPOSED AMENDMENTS TO THE RULE CHANGE PROPOSAL PRIORITISATION AND SCHEDULING FRAMEWORK

Thank you for the opportunity to comment on the rule change proposal prioritisation and scheduling framework.

Synergy commends the proposed framework amendments which will provide clarity in the factors influencing the urgency rating and prioritisation of Rule Change Proposals (**Proposals**) as well as ensure consistency with Wholesale Electricity Market Rules (**Market Rules**) and Gas Services Information Rules (**GSI Rules**).

Synergy has reviewed these proposed changes and wishes to make the following observations/suggestions:

- a) **Clause 1.:** This clause states that “the Panel may decide to extend” the default timeframes established for the Standard Rule Change Process and the Fast Track Process. Synergy considers that this framework would benefit from expanding its scope to encompass further details on the extension process given interdependencies with the prioritisation and scheduling process. For example, this may include information on:
 - (i) drawing attention to the possibility that consecutive periods of extension may result in delays greater than the lowest urgency rating (see section 4.2.2); and
 - (ii) whether the initial urgency assessment for a Proposal may require revision upon the extension of a deadline.
- b) **Clause 3.:** Synergy considers that this clause could be drafted in a way that a future consultation process is not required to amend it. For example:

The ERA provides the Executive Officer to the Panel, along with a mixture of dedicated and shared resources to provide the necessary services¹⁴. ~~The resources allocated to support the Panel as at 31 July 2019 include:~~

- ~~four full-time staff members;~~¹⁴
- ~~a variable share (depending on requirements) of a Principal Analyst;~~
- and
- ~~an annual consultancy budget.~~¹⁵

¹⁴ The full-time staff include the Executive Officer, an Assistant Director, a Principal Analyst and an Assistant Analyst. The ERA had also commenced procuring an additional full-time staff member as of 31 July 2019.

¹⁵ The consultancy budget covers legal advice on Proposals (particularly on drafting of Amending Rules) and for any consultants to deal with specific Proposals (e.g. a part-time staff member was employed in 2018/19).

c) Clause 4.2.1(6): Does the Panel possess sufficient information to consider the Proposal?

d) Clause 4.2.3(2): Synergy suggests that this clause could be re-drafted to clarify accountability and requirements. For example:

(2) RCP Support is to seek the advice of the MAC or GAB on the urgency rating for the Pre-Proposal or Rule Change Proposal, and in doing so, is to provide the MAC or GAB with their responses to questions listed in section 4.2.1 and the rating scale in section 4.2.2;

Should you require additional information regarding this submission, please contact me on either (08) 6282 7429 or Jo-Anne.Chan@synergy.net.au.

Yours sincerely



Jo-Anne Chan
Senior Regulatory Analyst