

4 December 2024

Economic Regulation Authority
Level 4, Albert Facey House
469 Wellington Street
PERTH WA 6000

Submitted via: <https://www.era.com.au/consultation>

Second Draft Determination – Energy Price Offer Ceiling 2024

Alinta Energy appreciates the opportunity to provide feedback on the Economic Regulation Authority's second draft determination of the Energy Price Offer Ceiling that will commence on 1 January 2025. The changes to the calculation parameters and associated implications since the first determination are noted.

We maintain our view that the dispatch profile used to determine the Energy Price Offer Ceiling should reflect the maximum duration of a cycle under a fast start inflexibility profile¹. The use of this profile is transparent and reflects the minimum duration for which a peaking generator should be prepared to run. The energy offer price ceiling must permit generators to recover all of the efficient variable costs it incurs in producing energy if it is scheduled to run for this short duration.

We support the proposed indexation.

Thank you for your consideration of Alinta Energy's submission. Should you wish to discuss this further please contact me at [REDACTED] or on [REDACTED]

Yours sincerely

[REDACTED]

¹ Under WEM Rule clause 7.4.45 the maximum length of a fast start inflexibility profile cycle is 60 minutes. We understand that our submission was not considered as it was submitted the business day following the 31 May 2024 submission deadline.