

3 April 2025

Economic Regulation Authority
Level 4, Albert Facey House
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Submitted via: publicsubmissions@erawa.com.au

Energy Offer Price Floor Review 2025: Draft Determination

Alinta Energy appreciates the opportunity to provide feedback on the ERA's Draft Determination of its 2025 Energy Offer Price Floor Review.

Alinta Energy notes that over the review period there were 44 Trading Intervals where the market cleared at the price floor and that these consistently occurred under conditions where low demand was satisfied by renewable intermittent generation, creating high Frequency Co-optimised Essential System Services (FCESS) requirements. It is further noted that the market has not cleared at the price floor since the 20 November WEM Rule changes (now known as Electricity System and Market Rules), and that this is attributed to the introduction of tiebreak methods that have enabled more efficient dispatch processes for the procurement of Frequency Co-optimised Essential System Services (FCESS).

Alinta Energy supports the Draft Determination that the Energy Offer Price Floor remains appropriate and does not need to change. As noted by the ERA, this is because:

- The instances where the market cleared at the price floor, were not related to the value of the price floor being too high;
- There have been no material changes in the relevant generator cycling costs.

Thank you for your consideration of our submission. If you would like to discuss further, please contact

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Yours sincerely

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