

To Economic Regulation Authority
Subject EEPC_2025_01: WEM Procedure: Benchmark Reserve Capacity Price
Date 27 November 2025

Good Afternoon

Thank you for the opportunity to comment on the procedure change proposal – Benchmark Reserve Capacity Price. As a significant generator and retailer within the SWIS, Perth Energy is keen to ensure that the BRCP is set at a level that provides adequate incentive for new generation without imposing unnecessary costs on our customers. We support the proposed changes to the BRCP Procedure which were well explained at the recent Market Advisory Committee meeting. We suggest, however, that there is one matter that should be given further consideration.

The GHD report that was published to support the BRCP determination in 2024 noted that BESS operators do not usually fully discharge these facilities. Rather, a minimum charge of around 20% or so is held at all times. We understand that this is now happening in the SWIS. This means that the MWh capacity of a BESS needs to be defined as its deliverable or usable capacity rather than its installed capacity.

The proposed procedure acknowledges that a facility needs to be oversized to address factors such as calendar fade during construction. Clause 2.1.6(c) states that the BESS must have enough energy storage capacity to enable 1200 MWh charge and discharge. Perth Energy suggests that direct reference to the minimum charge level may be appropriate. We suggest that consideration be given to modifying clause 2.1.6(d) to read:

Include the minimum level of equipment or system required by the ESM Rules and to sustain the maximum discharge level.

and modifying Clause 2.1.7 by adding an obligation on the consultant to determine

(c) the maximum discharge level

Should you have any questions please do not hesitate to contact me at [REDACTED] or on [REDACTED]. This submission may be made public.

Kind regards

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I am based in the Perth Office and work Tuesday, Wednesday and Thursday