[redacted]

27 July 2026

Steve Edwell
Chair
Economic Regulatory Authority Western Australia
Albert Facey House
4/469 Wellington Street Perth 6000

Dear Steve,

Western Power Response to proposed amendments to Wholesale Electricity Market (WEM) Procedure: Monitoring Protocol (EEPC_2026_02)

Western Power welcomes the opportunity to provide feedback on the proposed amendments to the WEM Procedure: Monitoring Protocol.

Western Power supports the overall direction of the proposed changes. The amendments appear consistent with the intent of the post-2023 market compliance framework and should assist the ERA in focusing compliance resources on matters that have the greatest impact on the effective operation of the WEM.

Given the increased reliance on regulatory discretion through the proposed triage process, investigation prioritisation framework and removal of prescribed reporting timeframes, Western Power seeks clarification on several aspects of the proposed approach to support transparency, consistency and regulatory certainty.

Western Power's feedback is as follows:

- **Self-reporting timeframes**

Western Power supports removal of the prescriptive 20 Business Day reporting expectation and agrees that participants should self-report suspected breaches as soon as reasonably practicable. To support consistent implementation, Western Power would welcome additional guidance on the ERA's expectations regarding reporting timeliness, particularly where internal investigations are ongoing or relevant information is still being established.

- **Governance of risk ratings**

Western Power would appreciate further detail on the governance arrangements that will apply to baseline risk ratings maintained outside the Procedure, including how participants will be notified of material changes and whether stakeholder consultation will be undertaken where risk ratings are revised.

- **Operation of the triage process**

Western Power supports the proposed risk-based triage approach and proportional treatment of lower-risk matters. To improve transparency and predictability, Western Power would welcome further guidance on the operation of the triage process, including the circumstances in which matters may be escalated from monitoring activities to formal investigation.

- **Consistency of regulatory decision-making**

Western Power would appreciate further detail on the measures that will support consistent application of ERA discretion across compliance assessments, investigation decisions and enforcement actions, including consistency across compliance personnel and over time.

Subject to clarification of these matters, the proposal does not appear to require material changes to Western Power's systems, processes or compliance controls.

If you have any questions regarding this response, please contact [redacted]

Yours sincerely,

[redacted]