

Our Ref: DM# 29972700
Enquiries: Genevieve Teo
Telephone: [REDACTED]

18 July 2023

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

publicsubmissions@erawa.com.au

Dear ERA

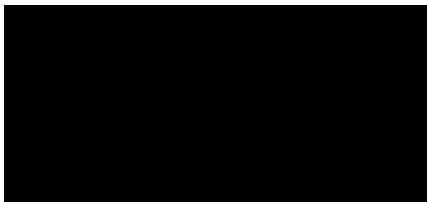
**EEPC_2023_03 PROCEDURE CHANGE PROPOSAL: ERA TRIGGERING THE SESSM
WEM PROCEDURE**

Synergy welcomes the opportunity to provide feedback to the Economic Regulation Authority (**ERA**) regarding the above draft Procedure.

Please refer to the table below for a summary of comments Synergy provides for consideration.

Should you have any queries in relation to this submission, please contact Genevieve Teo, Senior Regulatory Analyst at genevieve.teo@synergy.net.au.

Yours sincerely



**RUDOLF VORSTER
WHOLESALE STRATEGY AND PLANNING MANAGER**

Comments				
#	Section Ref	Page ref	Classification	Issue
	8.7, 8.10.6	3	Clarity	<p>In analysing the impact of pricing behaviour on Real-Time Market outcomes, 8.7(d) states that the ERA may compare the Frequency Co-Optimised Essential System Services (FCESS) Market outcomes with “other relevant jurisdictions”.</p> <p>8.10.6 also states that the ERA may use FCESS market costs in “comparable jurisdictions” as an indicator of inefficient Real-Time Market outcomes.</p> <p>Synergy seeks clarity on the criteria that the ERA will use to classify jurisdictions as comparable for the purposes of identifying inefficient Real-Time Market outcomes. For example, would the size of the comparison FCESS market be considered? We are cognisant that the WEM is a small market, and it may be difficult to identify a similar comparative jurisdiction.</p>