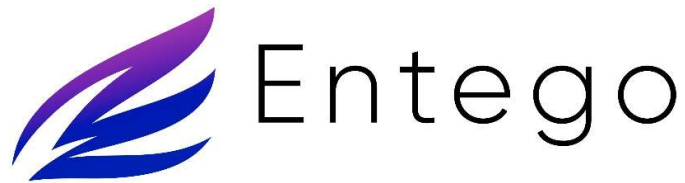


14 October 2024



Submitted via: <https://www.erawa.com.au/current-consultations>

**Re Procedure Change Proposal: Portfolio Determination (EEPC\_2024\_03)**

Entego welcomes the opportunity to comment on the proposed changes to the WEM Procedure Portfolio Determination and understands that these changes are associated with EPWA's proposed amendments to the WEM Rules under the FCESS Cost Review.

Acknowledging that the proposed changes align with the Exposure Draft of WEM Amending Rules released by EPWA<sup>1</sup>, Entego would like to voice concern with the ERA's decision to propose changes to the WEM Procedure based on an Exposure Draft and not the final version of the WEM Amending Rules.

At the time of writing of this submission, a final version of the WEM Amending Rules is yet to be released, however based on published submissions EPWA received as part of their public consultation on the Exposure Draft<sup>2</sup>, it is our opinion that the final version of the WEM Amending Rules will differ from the Exposure Draft. As an example, the proposed drafting of Section 3.1.2 of the WEM Procedure utilises wording from WEM Rule 2.16B.1(a) contained in the Exposure Draft verbatim, however several submissions made to EPWA call for alternative drafting.

Should there be any difference between the Exposure Draft and Final version of WEM amending rules, we would encourage the ERA to review and amend procedure drafting accordingly, as well as undertake further public consultation to allow appropriate feedback to be given.

Should more input be required or if you wish to clarify any of the points above please do contact me at

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Your sincerely

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Entego

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<sup>1,2</sup> Exposure Draft of WEM Amending rules and related submissions available from: <https://www.wa.gov.au/government/publications/energy-policy-wa-has-released-the-exposure-draft-of-fcess-cost-review-amendments-consultation#:~:text=Energy%20Policy%20WA%20has%20published%20the%20Exposure%20Draft%20of%20WEM>