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### **Proposed Modelling Scenarios - Whole of System Plan**

The Australian Energy Council (AEC) welcomes the opportunity to make a submission to the Energy Transformation Implementation Unit (ETIU) on the proposed modelling scenarios of the Whole of System Plan (WOSP) for the South West Interconnected System (SWIS). Due to limited time available to respond to the proposed modelling, our comments are high level only.

The AEC is the industry body representing 23 electricity and downstream natural gas businesses operating in the competitive wholesale and retail energy markets. These businesses collectively generate the overwhelming majority of electricity in Australia and sell gas and electricity to over 10 million homes and businesses.

The AEC supports the ETIU approach of utilising scenario based modelling to inform the development of the WOSP, and that the chosen scenarios present a broad range of conditions useful in testing appropriate pathways forward.

The Whole of System Plan presentation provided to industry afforded a reasonable amount of detail on the modelling approach, but we would like to understand the intended model logic with respect to battery and EV charge/discharge cycles. This has a substantial impact on the shape of the resultant hourly demand profiles that will ultimately drive outcomes in the energy mix.

It would also be useful to highlight how mechanisms in the DER roadmap may affect the demand profile used in the WOSP. We note that the DER Roadmap consultation workshop has not been held at the time of writing this submission, and this aspect may be covered in said forum. It is imperative to ensure the WOSP takes a whole of system approach to modelling. That is to say, the demand profile should not be taken as a given, but consideration must be given to the interaction of supply and demand to discover the least cost generation mix.

Finally, comments made by speakers at the Whole of System Plan Industry Forum held on 12<sup>th</sup> July 2019, indicated that the modelling would not explicitly target an emissions reduction objective, rather the emissions of each scenario would be a calculated output of the model. Given Australia has a national commitment to reduce emissions to 26-28 per cent on 2005 levels by 2030 under the Paris Agreement, we ask if an explicit carbon target should be incorporated into the modelling.

Any questions about our submission should be addressed to Scott Davis, Western Australia Policy Adviser by email to [scott.davis@energycouncil.com.au](mailto:scott.davis@energycouncil.com.au) or by telephone on 0457 784 119.

Yours sincerely,



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