

24 July 2020

Mr Peter Adams  
General Manager, Market Performance  
Australian Energy Regulator  
GPO Box 520 Melbourne Vic 3001Via [wholesaleperformance@aer.gov.au](mailto:wholesaleperformance@aer.gov.au)

Dear Peter

**Re: Our thoughts with respect to AER Issues Paper  
'Semi scheduled generator rule change(s)'  
and broader challenges**

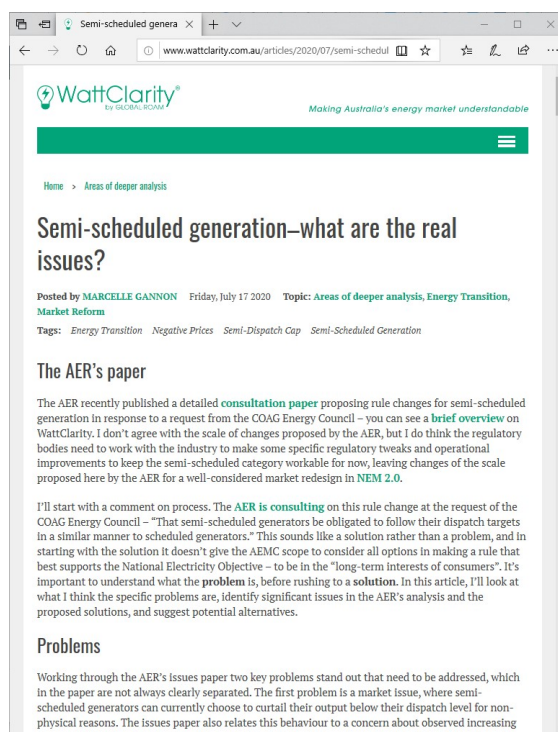
As you would be aware, as a company we rarely make formal submissions to deliberations about Market Reform.

However, we have received a considerable volume of complimentary feedback to an article posted by Marcelle Gannon here:

<http://www.wattclarity.com.au/articles/2020/07/semi-scheduled-generation-what-are-the-real-issues/>

Some were direct requests for us to make a formal submission based on Marcelle's article, such that it would be formally considered by the AER.

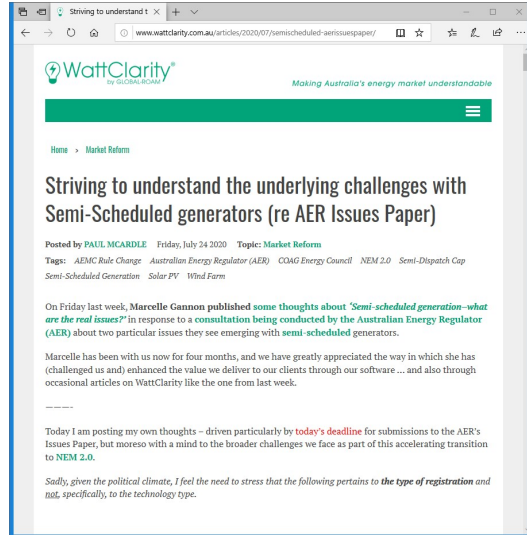
Hence please consider this letter a formal submission of the thoughts expounded in Marcelle's article linked above.



Furthermore, I would also draw your attention to the thoughts I have published this afternoon here:

<http://www.wattclarity.com.au/articles/2020/07/semischeduled-aerissuespaper/>

It would be appreciated if you could consider these thoughts also in conjunction with consideration of Marcelle's earlier thoughts (linked above).



We look forward to seeing the AER's deliberations on this issue.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Paul McArdle".

Paul McArdle

Managing Director  
Global-Roam Pty Ltd

Principal Author  
WattClarity ®