

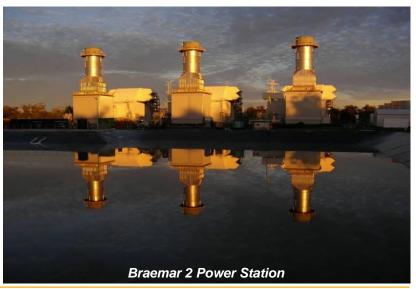




#### WHO IS ARROW ENERGY?

- Owned by Royal Dutch Shell and PetroChina
- Owns and operates Braemar 2 Power Station (B2PS)
- 3 x 150MW Siemens Open Cycle Gas Turbine
- Max 173MW (ambient conditions)
- Ramp Rate ~10MW or 30MW







#### FOCUS ON RAMP RATE

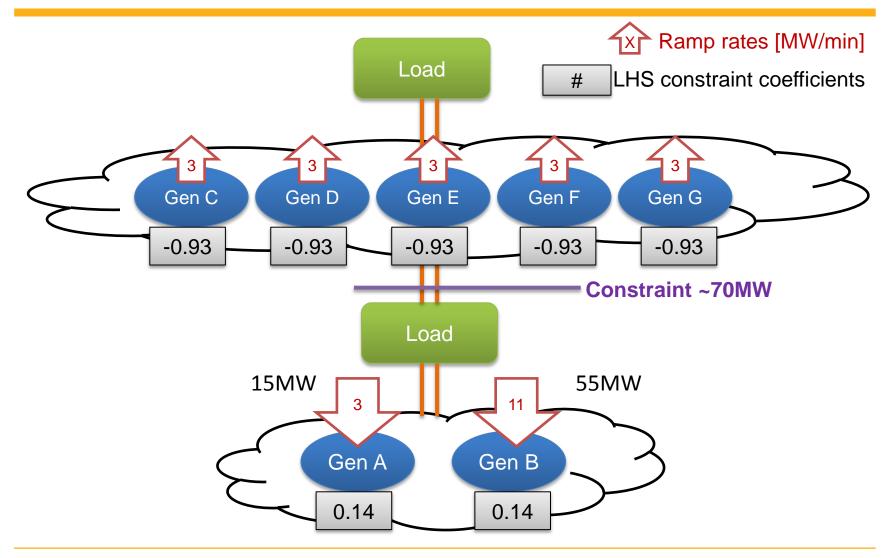
- Rule ~ maximum required technical capability
- Direct issues:
  - Max ramp varies
  - Modes
- Indirect issues
  - Disproportionate utilisation
- Unintended consequences
  - Units permanently de-rated
  - Investment bias
  - Forward market



Dalby Tipton | Central Gas Processing Facility



### **EXAMPLE OF CONSTRAINTS**





#### OTHER CONSIDERATIONS

- Market design
  - Gross vs Nett
  - Zonal vs Full Nodal
  - DI vs TI
  - Discrete DI
  - MCP
  - DSP
- Transmission
  - Investment criteria
  - Outage management
- Operation of constraints
- Impact of Portfolio

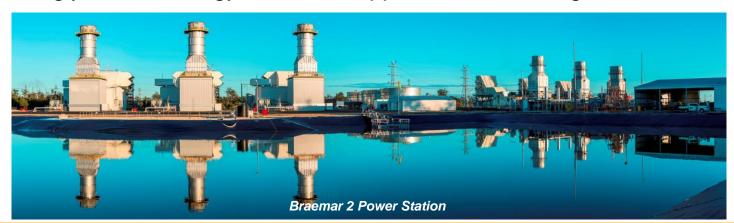


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#### IN SUMMARY

- Rule change holds issues
- Real risk of unintended consequences as yet been unquantified
- Other more fundamental drivers
- Seems to be a transitory issue
- Accordingly, Arrow Energy does not support the rule change





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