



INDEPENDENT
MARKET
OPERATOR

Wholesale Electricity Market Submission to Rule Change Proposal

RC_2013_09 Incentives to Improve Availability of Scheduled Generators

Submitted by

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Date submitted:	23 December 2013

Submission

Submissions for Rule Changes should be submitted to:

Independent Market Operator

Attn: Group Manager, Market Development
PO Box 7096
Cloisters Square, Perth, WA 6850
Fax: (08) 9254 4399
Email: market.development@imowa.com.au

1. Please provide your views on the proposal, including any objections or suggested revisions.

System Management welcomes the opportunity to provide a second submission in response to RC_2013_09 which endeavours to incentivise Market Participants to maximise the availability of their Scheduled Generators.

In response to its first round submission to RC_2013_09, System Management appreciates the IMO's insertion in the Draft Rule Change report of new clause 4.26.1C and amended clause 4.26.2 to clarify that the IMO (and not System Management) is responsible for adjusting the Planned Outage data to determine the liability for Facility Reserve Capacity Deficit Refunds.



Rule Change Proposal Submission Form:

RC_2013_09 Incentives to improve availability of scheduled generators
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System Management takes this opportunity to reiterate its view that the Planned and Forced Outage Rate calculations contained within Appendix 1 of the Facility Outages Power System Operation Procedure should be removed from the PSOP as it is not responsible for undertaking these calculations.

In the Draft Rule Change Report the IMO proposed to insert these calculation methodologies into an appendix of the Market Rules as part of future Proposed Rule Change PRC_2013_16. However, System Management does not see any significant impediments to inserting these calculation methodologies as they currently stand as part of RC_2013_09.

2. Please provide an assessment whether the change will better facilitate the achievement of the Market Objectives.

System Management considers the proposed amendments will better address the Wholesale Electricity Market objectives.

3. Please indicate if the proposed change will have any implications for your organisation (for example changes to your IT or business systems) and any costs involved in implementing these changes.

System Management confirms that no process or system changes will be required to comply with the Draft Rule Change Report.

4. Please indicate the time required for your organisation to implement the change, should it be accepted as proposed.

As no amendments are anticipated, System Management will be able to apply this rule change following commencement date.
