



INDEPENDENT  
MARKET  
OPERATOR

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## Wholesale Electricity Market Submission to Rule Change Proposal

### RC\_2013\_09 Incentives to Improve Availability of Scheduled Generators

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#### Submitted by

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<b>Date submitted:</b>	<i>1 July 2013</i>

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#### Submission

Submissions for Rule Changes should be submitted to:

##### Independent Market Operator

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

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

We are generally supportive of the structure and intention of the rule change. We would, however, like to see amendments to the proposed rule change to facilitate the recognition of the outage classification "Consequential".

In the past, where generators were not penalized for Planned Outages, it did not matter to a generator whether it was requested by the Network Operator to go on Planned Outages to facilitate outages of Network Equipment for servicing or other reasons. As requested by the



Market, a generator would enter a Planned Outage to facilitate transparency in the market. It alternatively would be able to lodge a Forced Outage after the fact which would be reviewed, and if applicable, converted by System Management to a Consequential Outage.

Now that a “limit” on Planned Outages has been proposed, it would not be correct to count Planned Outages (that would otherwise be Consequential Outages had the generator not submitted a Planned Outage request) against the percentage caps proposed in the Rule Change.

We propose that the Network Operator be given the ability to lodge Consequential Outage requests to both the generator and System Management, and if accepted, then the generator would be classified as being on “Consequential Outage” for that period of time. This Consequential Outage should not be counted against either the Forced or Planned Outage allowances proposed in 4.11.1D.

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

In our opinion, the Rule Change better facilitates the achievement of the Market Objectives through minimization of Outages and therefore will lead to reduction in costs to the Market.

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**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.**

No.

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

N/A.

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