
Minutes

Meeting No.	51
Location	IMO Board Room Level 3, Governor Stirling Tower, 197 St Georges Terrace, Perth
Date	Wednesday 11 July 2012
Time	2.05pm – 4.00pm

Attendees	Class	Comment
Allan Dawson	Chair	
Suzanne Frame	Compulsory - IMO	
Geoff Gaston	Discretionary – Generator	
Ben Tan	Discretionary – Generator	
Shane Cremin	Discretionary – Generator	
Steve Gould	Discretionary – Customer	
Michael Zammit	Discretionary – Customer	
Nenad Ninkov	Discretionary – Customer	(arrived at 2.30pm)
Peter Huxtable	Discretionary – Contestable Customer Representative	
David Murphy	Small Use Consumers’ Representative	(arrived at 2.20pm)
Julian Fairhall	Minister’s appointee (Proxy)	
John Rhodes	Compulsory – Customer (Proxy)	
Jacinda Papps	Compulsory – Generator (Proxy)	
Phil Kelloway	Compulsory – System Management	
Peter Mattner	Compulsory- Network Operator	
Wana Yang	ERA – Observer	
Apologies	Class	Comment
Andrew Everett	Compulsory – Generator	
Stephen MacLean	Compulsory – Customer	
Nerea Ugarte	Minister’s appointee - Observer	
Also in attendance	From	Comment
Jeff Renaud	EnerNOC	Presenter
Fiona Edmonds	IMO	Presenter
Aditi Varma	IMO	Observer
Jenny Laidlaw	IMO	Observer
Courtney Roberts	IMO	Minutes

Wayne Trumble	Griffin Energy	Observer (arrived 3.25pm)
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Item	Subject	Action
1.	<p>WELCOME</p> <p>The Chair opened the meeting at 2.05 pm and welcomed members to the 51st meeting of the Market Advisory Committee (MAC).</p>	
2.	<p>MEETING APOLOGIES / ATTENDANCE</p> <p>The following apologies were received:</p> <ul style="list-style-type: none"> • Stephen MacLean (Compulsory Class member) • Andrew Everett (Compulsory Class member) • Nerea Ugarte (Minister's appointee) <p>The following other attendees were noted:</p> <ul style="list-style-type: none"> • John Rhodes (proxy for Stephen MacLean) • Jacinda Papps (proxy for Andrew Everett) • Julian Fairhall (proxy for Nerea Ugarte) • Jeff Renaud (Presenter) • Fiona Edmonds (Presenter) • Wayne Trumble (Observer) • Aditi Varma (Observer) • Jenny Laidlaw (Observer) • Courtney Roberts (Minutes) 	
3.	<p>MINUTES OF PREVIOUS MEETING</p> <p>The minutes of MAC Meeting No. 50, held on 13 June 2012, were circulated prior to the meeting. The minutes were accepted as a true and accurate record of Meeting No. 50.</p> <p>Ms Jacinda Papps queried the outcome of the IMO listening to the recording of Meeting 48 and clarifying the paragraph in Agenda Item 8 – General Business that was raised by Mr Andrew Everett in relation to the discussion on 'greater value'. Ms Jenny Laidlaw informed Ms Papps that the paragraph related to a discussion on whether a comparison should be expressed as 'the greater of a and b' or 'the greater of a or b', and that after listening to the recording it was decided that the paragraph should be removed.</p>	
4.	<p>ACTIONS ARISING</p> <p>The following comments were noted on action items:</p> <ul style="list-style-type: none"> • Action item 36 – Mr Phil Kelloway raised a query regarding a reference to 	

	<p>a 10% POE peak demand event in 2003/04 that was used in the load curve determination for the Availability Curve in the 2012 Statement of Opportunities (SOO). The Chair requested that System Management contact the IMO to discuss System Management's concerns.</p> <ul style="list-style-type: none"> • Action item 43 – Ms Frame noted that she had discussed the dual fuel issue a week previously with Mr David Murphy, who was yet to arrive at the meeting. Ms Frame advised that Mr Murphy would be providing the MAC with an update on the progress around the implementation of incentives for dual fuel facilities in the Wholesale Electricity Market (WEM) at the August 2012 MAC meeting. • Action item 9 – Ms Suzanne Frame informed the MAC that Mr Greg Ruthven had provided some analysis on the action item in the meeting papers under agenda item 4a. However, as Mr Ruthven was unable to attend the meeting, the presentation would be deferred to the next MAC meeting. Mr Michael Zammit added that EnerNOC had conducted some further analysis and shared the results with Mr Ruthven. • Action item 11 – Mr Kelloway advised that arrangements to ensure that distribution connected generators received 48 hours notice of outages were now in place. Mr Ben Tan queried who the outage notices would come from. Mr Kelloway considered that the advice would probably come from Western Power's Network Operations Control Centre (NOCC). Mr Tan advised that in his most recent discussion with System Management it was agreed that Mr Tan should ignore any outage notice that did not come from Tesla's account manager. Mr Kelloway advised that he would confirm the correct process and advise MAC members of the details at the next meeting. • Action item 18 – Synergy's full legal advice on RC_2012_10 relating to the discriminatory nature of the current early entry capacity payments was distributed to MAC members. Mr Peter Huxtable requested if a electronic copy of the document could be circulated to the MAC. <p><i>Action Point:</i></p> <ul style="list-style-type: none"> • <i>System Management to contact the IMO to discuss System Management's query on a reference to a 10% POE peak demand event for the 2003/2004 year in the 2012 Statement of Opportunities.</i> • <i>Mr Kelloway to confirm who from System Management will notify distribution connected Generators about network outages.</i> • <i>The IMO to circulate an electronic copy of Synergy's legal advice on RC_2012_10 to MAC members.</i> 	<p>SM</p> <p>SM</p> <p>IMO</p>
5a.	<p>MARKET RULE CHANGE OVERVIEW</p> <p>Ms Frame provided an update to the MAC on the current Rule Changes under development.</p> <p>Ms Papps considered that the issue on Theoretical Energy Schedule equations was not yet resolved and so it should not be treated as being out of the issues log. The Chair agreed and confirmed that this was a minor error and the issue was not yet resolved.</p>	

5b.	<p>MARKET RULES EVOLUTION PLAN UPDATE</p> <p>Ms Frame informed the MAC that over the last month she and Mr Dawson had met with a variety of stakeholders in the industry. System Management and the Public Utilities Office (PUO) had been invited to these meetings and had attended when possible.</p> <p>Prior to these meetings, the IMO prepared a list of outstanding issues from the previous Market Rules Evolution Plan conducted in 2009. This list was extended with issues that have been accumulated in the Market Rules Suggestion Log as well as additional suggestions from stakeholders discussed in the meetings. The IMO expects to present a consolidated list of issues at the August 2012 MAC meeting.</p> <p>The Chair noted that a common theme from stakeholders was that a large number of changes had been made to the energy market and that these should be allowed to bed down for a period, although there had been some commentary on a Spinning Reserve market and the timing of gate closure. Similar comments had been received around the work currently being undertaken on the Reserve Capacity Mechanism, in that once this work had been completed a bedding down period would be required. Not many new issues were raised in the discussions.</p> <p>The Chair thanked stakeholders for their contribution to these meetings.</p> <p><i>Action Point:</i></p> <ul style="list-style-type: none"> • <i>The IMO to present the consolidated issues list resulting from the Market Rules Evolution Plan meetings to the August 2012 MAC meeting.</i> 	IMO
5c.	<p>PRC_2012_06: CLARIFICATION OF CLAUSE 2.10.2A</p> <p>The Chair invited Ms Fiona Edmonds to present the Pre Rule Change Proposal: Clarification of clause 2.10.2A (PRC_2012_06).</p> <p>Ms Edmonds informed the MAC that this rule change was being progressed to clarify the decision point under clause 2.10.2A and to add further rigor to the IMO's or System Management's decisions on whether to progress a Procedure Change Proposal from a Rule Participant. Ms Edmonds noted that the change to make decisions as to whether to progress Procedure Change Proposals had been originally included in the Rule Change Proposal: Competitive Balancing and Load Following Market (RC_2011_10), following discussion at the Rules Development Implementation Working Group (RDIWG) around the increased level of detail that would be included into Market Procedures for the new markets. There had however been an issue identified by the Office of Parliamentary Counsel when drafting clause 2.10.2A to be a Reviewable Decision under the Regulations, that an explicit decision was not made by either the IMO or System Management under this clause (but rather a decision was implicit from the drafting). The IMO and the PUO had subsequently determined to not include clause 2.10.2A as a Reviewable Decision under the Regulations as part of the regulatory changes for</p>	

	<p>RC_2011_10, but rather to progress a separate change to clause 2.10.2A at a later date to include an explicit decision from the IMO and System Management.</p> <p>Ms Edmonds noted that the IMO had prepared PRC_2012_06 to ensure that an explicit decision is made under clause 2.10.2A along with including timelines for making a decision to progress a Procedure Change Proposal and requiring details of the decision to be published on the IMO Web Site. Ms Edmonds also noted that the IMO considered that decisions with respect to the progression of Rule Change Proposals should be similarly subject to Procedural Review and that the IMO would work with the PUO to progress any necessary amendments to the Regulations to reflect these suggested amendments.</p> <p>Ms Papps noted that the Regulations allow for 28 days to request the review of a Reviewable Decision, while the Market Rules only allow for 10 Business Days. Although the Regulations would prevail, Mrs Papps suggested that the timings in the Market Rules and the Regulations be brought into alignment.</p> <p>All members supported the formal submission of the proposal into the Fast Track Rule Change Process, subject to the IMO considering the days allowed for a Reviewable Decision.</p> <p><i>Action Point:</i></p> <ul style="list-style-type: none"> • <i>The IMO to consider aligning the days to ask for a review of a Reviewable Decision in the Market Rules (10 Business Days) with the days prescribed in the Regulations (28 days).</i> • <i>The IMO to formally submit PRC_2012_06 into the Fast Track Rule Change Process subject to considering the days allowed for a Reviewable Decision.</i> 	<p>IMO</p> <p>IMO</p>
5d.	<p>PRC_2012_11: TRANSPARENCY OF OUTAGE INFORMATION</p> <p>The Chair invited Ms Fiona Edmonds to present the Pre Rule Change Proposal: Transparency of Outage Information (PRC_2012_11).</p> <p>Ms Edmonds noted that a Concept Paper on this issue was presented at the June 2012 MAC meeting. This Pre Rule Change Proposal would clarify the process for publishing outage information in a timely manner and clarifying what that information will comprise.</p> <p>Ms Edmonds explained that a lot of outage related information is already classified as public in either the Market Rules or the Confidentiality List published on the IMO Web Site. For example, Planned Outage schedules are currently public under clause 10.5.1 of the Market Rules. Ms Edmonds explained that PRC_2012_11 clarifies the requirement for System Management to provide all types of outage related information to the IMO for dissemination to the market as soon as practicable after receiving either a request or an update for a Planned Outage. PRC_2012_11 also clarifies what kind of information would be published by the IMO. Ms Edmonds added that the IMO will work with System Management to determine the current</p>	

	<p>structure of the information required under clause 3.18.6 and whether this would be an appropriate format for publication.</p> <p>Mr Kelloway considered that it could take System Management up to 18 months to implement the necessary changes. The Chair replied that he had previously had discussions with Mr Cameron Parrotte about undertaking this work at the end of the work for the Market Evolution Program (MEP). As this work was currently scheduled to finish by 5 December 2012 the Chair considered 18 months would seem a long time for this to be undertaken. Mr Kelloway advised that System Management would take this into consideration and that it would not want to delay this piece of work.</p> <p>Mr John Rhodes requested clarification of the definition of 'public' information and 'published' information. Mr Shane Cremin queried how the public can gain access to 'public' information. The Chair responded that 'published' information is published on the IMO Web Site and 'public' information is available to the public on request.</p> <p>All members supported the Rule Change Proposal and agreed for it to be formally submitted into the rule change process.</p> <p><i>Action Point:</i></p> <ul style="list-style-type: none"> • <i>The IMO to formally submit PRC_2012_11: Transparency of Outage Information into the rule change process.</i> 	IMO
5e.	<p>PRC_2012_12: UPDATES TO COMMISSIONING TESTS</p> <p>The Chair invited Ms Fiona Edmonds to present the Pre Rule Change Proposal: Updates to Commissioning Tests (PRC_2012_12).</p> <p>Ms Edmonds advised the MAC that the Pre Rule Change Proposal had been prepared by the IMO in conjunction with Griffin Energy and Verve Energy following identification of two issues relating to the Commissioning Test process under the Market Rules. Ms Edmonds outlined that the first issue related to the application of a civil penalty in situations where a Commissioning Test was requested in a time frame shorter than the 20 days prescribed in the Market Rules. This was a problem, because under the current Power System Operation Procedure (PSOP) for Commissioning and Testing, there was an ability for System Management to approve a Commissioning Test requested within the 20 day timeframe if it had sufficient ability to accommodate that Commissioning Test. By having System Management approve the Commissioning Test, the Market Participant is subject to a civil penalty, which the IMO considers perverse as System Management has sufficient scope to approve the Commissioning Test and there are no implications for system security or reliability.</p> <p>The second aspect of the proposal was around providing more flexibility in terms of Commissioning Test plans. Currently, when Market Participants apply for a Commissioning Test they provide an indicative test plan, which includes a daily schedule of what is to be undertaken during the period over which they are undertaking the Commissioning Tests. The current Market Rules</p>	

	<p>state that if a Market Participant is undertaking a Commissioning Test and on the last day it discovers that it actually needs to undertake a further test the following day, it is precluded from doing so. In this case, the Market Participant would need to go back and apply with the 20 Business Days, advance application process which is an unworkable process at the moment.</p> <p>Ms Edmonds noted that the IMO has worked with Verve Energy and Griffin Energy to try and create more flexibility around this process, but at the same time trying to strike a balance, so that System Management has the tools available to it to ensure that system security is not threatened. PRC_2012_12 proposes that a request for a Commissioning Test would be made seven Trading Days before the event is scheduled to take place and System Management would have two Trading Days to make a decision. This would bring the approval process closer to real time than the 20 Business Day requirement that is currently in place, but System Management would be able, if it did not consider it had sufficient ability to adequately consider the a request, to reject an application made in a time frame shorter than 20 Business Days.</p> <p>Ms Edmonds added that Griffin Energy had requested to reduce the timeframes from the seven Trading Days that the IMO had proposed. Ms Edmonds sought the views of members on moving those dates forward.</p> <p>Ms Papps noted that Verve Energy was very appreciative that the IMO had worked with it on this issue. Verve Energy's main concern has been around revisions to Commissioning Plans. Verve Energy was comfortable with the 20 Business Day timeframe for a new Commissioning Plan but considered more flexibility is needed when there are changes to the original plan.</p> <p>Mr Cremin and Mr Kelloway queried whether the IMO would consider defining 'Significant Maintenance'. Ms Edmonds responded that the IMO had considered this previously but had found that 'Significant Maintenance' is used in a number of areas of the Market Rules in slightly different contexts. This would be a substantial piece of work to get the definition to apply universally. Ms Edmonds noted that the approach System Management has taken in defining Significant Maintenance in a PSOP appeared to be working.</p> <p>Mr Tan queried if further work was planned around the interaction between commissioning and the Balancing Market. Mr Tan raised a number of concerns about the impacts of an unregistered Facility commissioning outside of the Balancing Market, and considered that it was currently unclear how the process should work and how participants interact with System Management in these situations.</p> <p>The Chair acknowledged Mr Tan's concerns and considered that the IMO should look into the issues further. However, the Chair confirmed that the intention was for all Facilities to commission within the Balancing Market.</p> <p>The MAC agreed for PRC_2012_12 to be formally submitted into the rule change process, subject to the IMO recognising that there are further issues with the process of commissioning and testing to be looked at separately.</p>	
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	<p><i>Action Point:</i></p> <ul style="list-style-type: none"> • <i>The IMO to formally submit PRC_2012_12 into the Standard Rule Change Process.</i> 	IMO
6.	<p>MARKET PROCEDURE CHANGE OVERVIEW</p> <p>Ms Frame noted that the first submission period for the Rule Change Proposal: Prudential Requirements (RC_2011_09) had been extended to allow sufficient time to prepare the associated Market Procedure for the IMO Procedure Change Working Group and to allow for both processes to run in parallel.</p> <p>The MAC noted the overview of recent and upcoming procedure changes.</p>	
7a.	<p>WORKING GROUP OVERVIEW</p> <p>The MAC noted the Working Group overview and approved the request for Ms Papps to replace Mr Andrew Everett on the IMO Procedure Change Working Group as Verve Energy's representative.</p> <p><i>Action Point:</i></p> <ul style="list-style-type: none"> • <i>The IMO to update the membership details in the IMO Procedure Change Working Group's Terms of Reference to replace Mr Andrew Everett with Ms Jacinda Papps and update the website accordingly.</i> 	IMO
7b.	<p>RDIWG UPDATE</p> <p>Ms Frame provided an update on the RDIWG and advised the MAC that the final meeting is scheduled for 9 August 2012. The meeting will be followed by refreshments to thank members for their contribution to the Working Group.</p> <p>The MAC was informed that there will be an update on the progress of the new Balancing Market and that this would be provided to the MAC rather than just the RDIWG.</p> <p>Mr Rhodes requested if there had been any review of information to date given that the new Balancing Market has been live for almost a month. The Chair advised that the IMO Market Operations team have scheduled a weekly review of performance of the Balancing and Load Following Markets. One was held the previous Friday which followed on from regular Friday meetings that the IMO held during the parallel run which was conducted in June. The idea of holding these weekly Friday meetings was to review those performances and provide an update on the progress. The Chair invited the MAC to contact Mr Bruce Cossill to attend if they are interested.</p> <p>The Chair gave a brief update on how the Balancing Market was going. He noted that there had been some issues around load forecasts, where the forecast price was not reflecting the final prices. The Chair informed the MAC that the IMO was working with System Management on this. System Management was trying to improve its load forecasts so that the forward price signals could be seen more readily in the market. There also had been a</p>	

	<p>couple of administrative issues with Participants offering into the market. One participant had missed for a six hour window, a volume of generation, which as a result affected the price in one six hour block. The Participant had missed out on their gate closure and was unable to modify even though it recognised that there was an error. Other issues were related to out of merit dispatch and errors with providing dispatch instructions Overall from a technology perspective, it was working reasonably well and the IMO had not had any issues to report.</p> <p>Mr Kelloway informed the MAC that there had been a few performance issues and the spreadsheet that System Management had been using had crashed on a few occasions. System Management had found that there were a number of generators clustered around the marginal unit which resulted in generators getting Dispatch Instructions more than anticipated. Mr Kelloway explained that it would take time for the market to get comfortable with it and that System Management were awaiting the dispatch planning tool and the real time dispatch engine. He added that the recent unexpected cold weather was also putting pressure on prices.</p>	
7c.	<p>Reserve Capacity Mechanism Working Group (RCMWG) UPDATE</p> <p>Ms Frame provided an update on the RCMWG and advised the MAC that there was a half day workshop on 4 July 2012 which provided the members with an opportunity to view alternative options in relation to dealing with the current oversupply of capacity. Mr Mike Thomas facilitated the half day workshop which allowed members to work through examples, voice opinions and view the outcomes that could be achieved. She added that Mr Thomas would present a summary of the outcomes of the half day work shop to the next RCMWG meeting which was scheduled for the next day.</p> <p>With regards to harmonisation of demand and supply side sources, the working group gained agreement in principle at the May meeting. Dr Richard Tooth would present the recommended solution in a paper at the next RCMWG meeting . The paper would also include recommendations around fuel requirements. She noted that the working group would be considering the Dynamic Refunds Mechanism next; it would involve some history and members would be invited to discuss and give their views.</p>	
8.	<p>DEMAND SIDE MANAGEMENT BRIEFING</p> <p>The Chair invited Mr Jeff Renaud, Director of EnerNOC across Australia/New Zealand to present on Demand Side Management (DSM).</p> <p>The following discussion points were noted:</p> <ul style="list-style-type: none"> • Mr Shane Cremin questioned if EnerNOC got any monetary benefit for providing significant value to the network. Mr Renaud explained that cooperating with the network providers has to be at the core of the DSM business. He added that the network side of the business is not given much consideration in the Market Rules and that the majority value for DSM comes out of the capacity market. • The Chair queried about the savings made in peak demand as a result of demand response, to which Mr Renaud responded that in many cases overnight lighting would be switched off which doesn't affect 	

	<p>the peak but provides savings via energy efficiency.</p> <ul style="list-style-type: none"> • Mr Cremin questioned the level of capacity payments between other market and WEM. Mr Renaud answered that the payment differs across markets and the general range would be anywhere between \$40,000 to \$130,000 per MW. He added that in his experience, the 2012/13 and 2013/14 capacity payments in WEM were relatively generous compared with international markets. There was further discussion on whether DSM programs get network service payments in addition to capacity payments. Mr Renaud responded that there were no jurisdictions in his knowledge that got a network payment and a capacity payment simultaneously. • Mr Nenad Ninkov questioned whether from a system security point of view DSM was seen as equivalent to generation in the United States. Mr Renaud explained that that was indeed the case and that was why it got an equivalent payment. He added that in most US markets, DSM was treated in line with what has been proposed in the RCMWG, which is unlimited availability whenever the system was in an Emergency Operating State. • Mr Renaud informed the MAC that EnerNOC was working on providing telemetry to System Management for complete visibility of available DSM facilities. 	
9.	<p>GENERAL BUSINESS</p> <p><i>RC_2011_02: Reassessment of Allowable Revenue during a Review Period:</i></p> <p>Ms Frame advised the MAC that this Rule Change Proposal was submitted in 2011 which was initiated from the ERA in relation to the reassessment of allowable revenue.</p> <p>Ms Frame outlined that in the Draft Rule Change Report, the IMO Board sought the views of Market Participants on their concerns around specific elements of the changes relating to the proposed thresholds. It was noted that in the second submission period there were no submissions received in relation to the IMO Board's specific request.</p> <p>This Rule Change was approved by Minister on 3 July 2012 however, the Minister did note that IMO should consider undertaking further consultation to identify any additional amendments relating to the provisions needed to be in place before the amending rules commence on 1 July next 2013.</p> <p>Ms Frame requested the advice of the MAC to see if members would like the IMO to consider any further amendments in relation to these provisions in order to fulfil the request of the Minister. Ms Frame noted that as the Rule Change had already been approved by the Minister, any further amendments to the provisions would require a new Rule Change Proposal since the Market Rules do not contemplate the ability to undertake further consultation on a Rule Change that has already been approved.</p> <p>Ms Frame advised the MAC that The IMO Board considered the original Rule Change Proposal as proposed by ERA, but modified the proposed 10% threshold for Allowable Revenue to remain at 15%, while incorporating the recommended 10% to a Capital Expenditure threshold.</p>	

	<p>Ms Wana Yang requested some context be provided as there were no relevant documents provided to the MAC members at the meeting.</p> <p>The Chair provided an overview of the issues that ERA raised in the original Rule Change Proposal, which was initiated in response to the situation where the MEP project failed to trigger a Declared Market Project, and the ERA were not in a position to respond to a direct request from the IMO to make an assessment of the project.</p> <p>Ms Yang explained the two main concerns by the ERA, i.e. the consultation process and the decision making by the IMO Board. Ms Yang noted the support from the MAC when the pre-rule change concept paper was discussed at the MAC meeting and the support presented in the submissions during the first consultation period. However, the IMO Board changed the Rule Change Proposal in its Final Rule Change Report from the Draft Rule Change Report without undertaking further consultation with Market Participants. Given that only two Rule Participants are directly affected by this Rule Change Proposal, i.e. the IMO and System Management, the decision by the IMO Board also gave rise to perceived conflict of interest in regard to governance.</p> <p>The Chair responded that the IMO Board requested the Market's views on their draft decision which was presented in the Draft Rule Change Report in which no submissions were received in the second consultation period.</p> <p>Discussion ensued where a number of MAC members clarified that the request from the Board had been made at Draft Rule Change Report stage and had been subject to a full consultation period; where no submissions were received on the matter.</p> <p>The Chair confirmed that if a project half the size of MEP was initiated today it would trigger the threshold for a Declared Market Project, and highlighted that while the IMO Board had made the decision, the ultimate outcome was subject to Ministerial Approval.</p> <p>There was general acknowledgment from the MAC that the Rule Change had significantly improved governance; however Ms Yang reiterated her concerns with maintaining the 15% Allowable Revenue threshold.</p> <p>The Chair acknowledged Ms Yang's concerns and offered the opportunity for the ERA and Secretariat to meet with the IMO Management and IMO Board to discuss the issue.</p> <p>No further issues were raised on this matter and the Chair welcomed the ERA and the IMO to discuss this further offline if necessary.</p>	
<p>CLOSED: The Chair declared the meeting closed at 4:00 pm.</p>		