
Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2007_03 Treatment of DSM in Outage Planning and PASA

Submitted by

Name:	Shane Cremin
Phone:	9261 2908
Fax:	
Email:	shane.cremin@thegriffingroup.com.au
Organisation:	Griffin Energy
Address:	L15, 28 The Esplanade, Perth 6000
Date submitted:	17 August 2007

Submission

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

Griffin acknowledges the limitations on DSM in providing contingency planning and coverage for forced outages. DSM is used as a capacity augmentation mechanism during times of expected peak demand. Occurrences of peak demand in the SWIS can be generalised to the summer months and then reasonably, but not always accurately, predicted according to day ahead forecasts of temperature. It is clear that DSM can be used for short to medium term outage planning and is a valuable resource in the capacity market. As such, DSM's contribution to system adequacy should be recognised in System Management's outage planning and PASA studies.

Griffin agrees that System Management should, at the least, recognise the 'reasonable' forecast of available DSM when conducting outage planning and PASA studies.

Griffin suggests that the inadequacies of DSM as a reliable capacity augmentation mechanism during forced outage contingencies, as outlined by System Management in the original version of this rule change proposal, should be addressed in a separate forum.

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

Griffin believes the proposed rule change in its revised form (including a reasonable forecast of available DSM) will better facilitate, or at the very least not impede the facilitation, of achieving the

Market Objectives. Griffin would not necessarily hold this view of the proposed rule change in its original form

-
- 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 immediate impact.

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

The proposed rule change could be incorporated immediately.
