

24 July 2008

Ms Dora Guzeleva
Manager, Market Administration
Independent Market Operator
PO Box 7096
Cloisters Square WA 6850

Dear Dora,

Proposed Rule Change RC_2008_14 (Information from Network Operators)

Thank you for the opportunity to comment on proposed rule change RC_2008_14, concerning information from Network Operators.

Western Power (WP) understands that the purpose of the proposed rule change is to enhance the flow of communication between the IMO and Western Power in order to ensure the efficient allocation of Certified Reserve Capacity fully cognizant for example of possible network operating constraints. In short, Western Power supports the intention of the proposal but has some reservations regarding the proposed wording. WP consequently offers the following comments:

- Generally, Western Power considers the wording of the proposed rule change is too broad and possibly onerous. The nature of the information sought is not specified, and the IMO could potentially ask for anything from WP. WP already has onerous obligations to provide data to numerous government bodies, and any additional burden would need to be properly resourced. The rule should specify in reasonable detail what type of data WP is to provide, and it should be data that WP has on hand and should not require significant research or effort to compile.
- The rule should acknowledge that WP may be prevented from disclosure of some data due to privacy requirements and confidentiality requirements. Most access information is confidential under the Access Code and ERA approved standard access contract. In many cases it is possible that an applicant themselves may be in a better position to provide the required information under a statutory declaration.
- Any deadline imposed by the IMO for the provision of information must be reasonable and subject to extension and appeal.
- WP has statutory obligations to act commercially and where the amount of work required to provide the IMO with requested information is significant WP may be required to charge the IMO an appropriate fee.
- System Management in Western Power also has a requirement for a free flow of certain information between them and the IMO. System outages are planned upto 3 years in advance and system security could be compromised due to decisions regarding planned outages being made without being fully cognizant of the likely system operating state at the time. (WP understands System Management will be making a separate submission in this regard.)

Western Power generally supports what is understood to be the intention of rule change RC_2008_14 and considers it would be an improvement to the Market Rules by making the rules more consistent with the Wholesale Electricity Market objectives (most notably to promote the economically efficient, safe and reliable production and supply of electricity). Western Power however believes it is important for the issues above to be considered and appropriate changes to the wording of the proposed rule change introduced.

Should you have any queries or wish to discuss any matter please do not hesitate to call either myself or Neil Gibbney on 9326 4564.

Yours sincerely,



Peter Mattner
Manager Regulation, Pricing and Access Development