
Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2009_08 Updates to Commissioning Provisions

Submitted by

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Submission

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

Verve Energy generally supports the intent of the greater part of RC_2009_08. However Verve Energy has reservations with respect to the publication of the details contained within Commissioning Test plans.

The IMO specifically asked for comment on the new clause 3.21A.16 which will require System Management to provide approved Commissioning Test plans to the IMO to be published under the new clause 10.6.1(f). Verve Energy fails to understand the value that the market will derive from this given that most Market Participants are not impacted by commissioning activities.

Verve Energy as the balancer views that publication of Commissioning Test plans would assist it in performing this role through better management of its fuel position. However this does not require a full disclosure of the Commissioning Test plan to the market. It can be viewed that Commissioning Test plans are the equivalent of the Resource Plan for the facility on commissioning and given that there are strict confidentiality provisions surrounding Resource Plans, this should not be any different for Commissioning Test plans. At the most, visibility of Commissioning Test plans should be limited to only a megawatt profile.

Verve Energy is concerned that full disclosure of Commissioning Test plans may lead to Market Generators being less forthcoming with detailed information to System Management. This may result in a reduction of the effectiveness of System Management in performing its obligations.

Additionally, the nature of commissioning activities is such that changes will occur. This then raises the question of should there be a republication of the Commissioning Test plan every time there is a change to the plan as it does not impact on any Market Participant except the balancer.

The IMO in the Addendum to the Draft Rule Change Report asked for further comment on the issue of imposing the obligation of the provision of the Commissioning Test plan on the Market Generator, rather than System Management. Verve Energy views that Commissioning Test plans are confidential in nature and System Management should not be the party that provides this plan to the IMO. System Management has strict guidelines that it operates within with respect to the confidentiality of Resource Plans. This should also apply to Commissioning Test plans in order to be consistent with the Market Rules. If Commissioning Test plan information has to be made available, the obligation should be imposed on the Market Generator.

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

Verve Energy agrees that the greater part of RC_2009_08 will support market objective (b) by facilitating efficient entry of new competitors.

However, the IMO has not sufficiently explained the benefits and how the Market Objectives are met by the full disclosure of Commissioning Test plan provisions as set out in the proposal.

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.

The proposed changes will not have any organisational implications for Verve Energy.

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

Verve Energy will not require additional time to implement the change if it is accepted.