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## Wholesale Electricity Market Rule Change Proposal Submission Form

**RC\_2009\_20      Opportunistic Maintenance outage approval  
timeframe**

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### Submitted by

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### Submission

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

#### Background

Under Market Rule 3.19.2(a), Market Participants and Network Operators may ask System Management to approve Opportunistic Maintenance (defined as an outage of a Facility or Item of equipment that is not a Scheduled Outage) at any time between 6:00am and 10:00am on the Scheduling Day, which is the day prior to the Trading Day.

If a Market Participant or the Network Operator does not apply for Opportunistic Maintenance between 6.00am to 10.00am on the Scheduling Day, it may still apply for an Opportunistic Maintenance outage on the Trading Day under Market Rule 3.19.2(b). However, in this case it must do so no later than one hour prior to the commencement of the Trading Interval during which the requested Opportunistic Maintenance is to commence. In addition, the Market Participant or the Network Operator must satisfy System Management that the outage:

- is to allow minor maintenance to be performed;
- does not require changes in scheduled energy or ancillary services; and
- ends before the end of the Trading Day.

While System Management has noted that it provides a file containing all known outages to the IMO shortly after 8:00am each day, subsequent discussions have revealed that under the applicable Power System Operating Procedure, it is not required to advise a Market Participant or Network Operator that a request for Opportunistic Maintenance under Market Rule 3.19.2(a) has been approved until 12:00pm on the Scheduling Day (i.e. the day prior to the Trading Day).

### **Rule Change Proposal**

System Management has suggested that this timeframe (6.00am to 10.00am) is rigid and limits the ability of Market Participants to effectively utilise the (more flexible) Opportunistic Maintenance outages available under Market Rule 3.19.2(a).

RC\_2009\_20 would amend Market Rule 3.19.2(a) to allow Market Participants and Network Operators to ask System Management to approve Opportunistic Maintenance at any time between:

- 10:00am on the day before the Scheduling Day (i.e. two days prior to the Trading Day); and
- 10:00am on the Scheduling Day (i.e. the day prior to the Trading Day).

### **Alinta's views**

Alinta supports RC\_2009\_20.

Discussions at the June Market Advisory Committee (MAC) meeting suggested that it may be preferable that RC\_2009\_20 be further amended to align the 10:00am close of the Opportunistic Maintenance outage application window in Market Rule 3.19.2(a) with the reporting by System Management of all known outages to the IMO.

It appears that this information is provided to the IMO under Market Rule 7.3.4, which requires that between 8:00 AM and 8:30 AM on the Scheduling Day System Management provide the IMO with a schedule of Planned Outages, Forced Outages and Consequential Outages of which it is aware at that time. Under Market Rule 3.19.11, an approved Opportunistic Maintenance outage under clause is a Planned Outage.

However, it appears that alignment of the close of the Opportunistic Maintenance outage application window and the reporting by System Management of all known outages to the IMO would require a number of changes, including to Power System Operating Procedures.

At this stage, increasing the length of the Opportunistic Maintenance outage application window is likely to support Market Participants and Network Operators in requesting System Management's approval much earlier than is currently possible. As a result, it is likely that RC\_2009\_20 will facilitate the schedule provided to the IMO under Market Rule 7.3.4 more completely reflecting all known outages for the following Trading Day.

On this basis, Alinta supports RC\_2009\_20 as submitted by System Management.

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

Market Rule 2.4.2 states that the IMO must not make Amending Rules unless it is satisfied that the Market Rules, as proposed to be amended or replaced, are consistent with the Wholesale Market Objectives. The Wholesale Market Objectives are as follows.

- (a) To promote the economically efficient, safe and reliable production and supply of electricity and electricity related services in the South West interconnected system.
- (b) To encourage competition among generators and retailers in the South West interconnected system, including by facilitating efficient entry of new competitors.
- (c) To avoid discrimination in that market against particular energy options and technologies, including sustainable energy options and technologies such as those that make use of renewable resources or that reduce overall greenhouse gas emissions.
- (d) To minimise the long-term cost of electricity supplied to customers from the South West interconnected system.
- (e) To encourage the taking of measures to manage the amount of electricity used and when it is used.

Alinta considers that the Market Rules, as proposed to be amended or replaced by RC\_2009\_20, are likely to be consistent with Wholesale Market Objective (a) and (d). This is because the Market Rules, as amended, would support Market Participants and Network Operators in requesting System Management's approval of Opportunistic Maintenance much earlier than is currently possible. As a result, it is likely that RC\_2009\_20 will facilitate the more economically efficient, safe and reliable production and supply of electricity in the SWIS.

Further RC\_2009\_20 is unlikely to be inconsistent with Market Objectives (b), (c) and (e). However, the Rule Change Proposal is unlikely:

- to encourage competition among generators and retailers in the South West interconnected system, including by facilitating efficient entry of new competitors; or
- to affect the manner in which the market treats particular energy options and technologies, including sustainable energy options and technologies such as those that make use of renewable resources or that reduce overall greenhouse gas emissions; or
- to affect the taking of measures to manage the amount of electricity used and when it is used.

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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.**

The changes to the Market Rules contemplated by RC\_2009\_20 would not require Alinta to change its IT or business systems, and hence there are no IT or business costs associated with the rule change proposal.

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

The changes to the Market Rules contemplated by RC\_2009\_20 would not require Alinta to change its IT or business systems, and hence there is no specific period of time that would be required to implement the changes arising from the rule change proposal.

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