Wholesale Electricity Market
Rule Change Proposal Submission Form

RC_2009_26   Heads of Power for Market Procedures

Submitted by

Name:	Catherine Rousch
Phone:	6212 1125
Fax:	
Email:	Catherine.Rousch@synergy.net.au
Organisation:	Synergy
Address:	228 Adelaide Terrace Perth 6000
Date submitted:	7 August 2009

Submission

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

Synergy supports Rule Change Proposal RC_2009_26 and agrees that it should proceed under the Fast Track Rule Change Process.

To ensure an efficient and effective market, the IMO needs to have authority to undertake its role in the Procedure Change Process for **all** procedures, including those developed outside the Market Rules eg those developed under regulations or without a specific Market Rule requiring development.

Specifically, Synergy supports providing the IMO and System Management with the ability to enforce and maintain the following procedures by explicitly referring to them in the Market Rules:

1) Data Cleansing Power System Operation Procedure;
2) Information Confidentiality Procedure;
3) System Restart Power System Operation Procedure; and
4) Declaration of Bilateral Trades and the Reserve Capacity Auction Procedure.

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

Synergy considers that, by ensuring the IMO has the authority to enforce, develop and amend all procedures, the Market Rules are supported from an operational perspective.

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.

Synergy would not require any changes to IT or business systems nor incur any organisational costs as a consequence of adopting the proposed change.

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

Synergy would be able to implement this rule change immediately.