
**Wholesale Electricity Market
Rule Change Proposal Submission Form**

RC_2009_33 Provision of Information to the IMO

Submitted by

Name:	Ky Cao
Phone:	08 9420 0300
Fax:	08 9474 9900
Email:	k.cao@perthenergy.com.au
Organisation:	Perth Energy
Address:	Unit 3, 77 Mill Point Road, South Perth WA 6151
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Submission

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

Background

The Market Rules place an obligation on Market Participants to provide full and final details of any Planned Outage, Forced Outage or Consequential Outage to System Management, no later than fifteen calendar days following the Trading Day (3.21.7). System Management must pass on this information to the Independent Market Operator (the IMO). The section of the Market Rules that relates to Notices of Disagreement provides that Market Participants may dispute data that the IMO has used in performing the settlement calculations.

System Management considers that clause 9.20.7 (relating to settlement disputes arising out of information provided to the IMO by System Management or a Metering Data Agent) could be interpreted in a way so as to give Market Participants a possibility to dispute information relating to outages, even after the fifteen day limit that is imposed for providing final information on outages to System Management under clause 3.21.7.

Change Proposal

System Management has proposed a number of changes to clauses 3.21.7, 7.13.1A and 9.20.5 to remove any doubt that the information that Market Participants provide to System Management under clause 3.21.7 in relation to outages must be provided within fifteen days, and that once the information has been provided it is considered final, including for the purposes of clause 9.20.5.

Perth Energy's Views

Perth Energy queries whether there have been any examples to date where a Market Participant has sought to amend information relating to outages originally provided under clause 3.21.7 by submitting a Notice of Disagreement.

Although Perth Energy does not consider the current wording of the Market Rules to be ambiguous, Perth Energy does not object to the proposed amendments should it help to remove any doubt that may exist over the current fifteen day deadline for Market Participants to provide final information in relation to outages.

Suggested Revisions

Perth Energy queries the proposed legal text in clause 3.21.7(b) which makes reference to clause 7.13.14. Perth Energy believes this should be a reference to clause 7.13.1A.

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

Perth Energy considers the change would marginally better facilitate the achievement of the Market Objectives¹. Perth Energy agrees that removing potential costs relating to administration and legal interpretation would have a positive impact on Market Objective (a)

Perth Energy does not consider the change proposal impacts on the achievement of Market Objectives (b), (c), (d) and (e).

¹ The objectives of the market are:

- (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; and
- (e) to encourage 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.**

There will be no impact for Perth Energy.

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

Perth Energy does not require any lead time to implement the change.
