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

RC_2009_41 Removal of Appendix 8 - "Top-up and Spill Rules"

Submitted by

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Submission

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

Background

Prior to the current Wholesale Electricity Market (WEM) coming into force, the electricity market in the South West Interconnected System (SWIS) was governed by the Top Up and Spill (TUAS) arrangement rules. Although none of the provisions of the old TUAS arrangement survive in the current market the entire TUAS rule book is currently contained in the Market Rules Appendix 8.

Change Proposal

The Independent Market Operator (the IMO) has proposed to amend the Market Rules by deleting Appendix 8 in its entirety, as well as a handful of cross references to Appendix 8 that appear in section 1 (Introduction) of the Market Rules.

The IMO has also elected to progress the rule change as a Fast Track rule change.

Perth Energy's Views

Perth Energy agrees that it is unnecessary to contain the entire rule book of the previous electricity market arrangements within the current Market Rules. Perth Energy considers the rule change proposal could be considered a “house keeping” proposal and that the changes are of a minor nature. Perth Energy therefore agrees that it is appropriate the rule change proposal follows the Fast Track rule change process.

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

Perth Energy considers the change would better facilitate the achievement of the Market Objectives¹. Perth Energy agrees that removing this voluminous appendix of the Market Rules, that has no impact on the operation of the current Wholesale Electricity Market, would have a positive impact on Market Objective (a), at least by reducing printing costs for Market Participants and other interested parties.

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

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.

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.

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.