
Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2010_15 MAC Membership Review

Submitted by

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Submission

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

DMTenergy supports the proposed Amending Rules which enable the expansion of MAC membership at the discretion of the IMO. Creating the potential for additional Market Generator and Market Customer representatives on the MAC would assist those participants that operate within these classes but which many would recognise as a separate category of participant.

The expanding DSM provision within the WEM has brought the entry of several demand-side aggregators to the WA market that function distinctively from other participants. DSM aggregators operate not as Retailers, Generators, individual Contestable or small-use Customers, Network Operators or Ancillary Service Providers, although they may often represent or conduct activities that are in common with these other recognised rule participant or MAC membership classes.

While DMTenergy believes there is a strong case for a new class of WEM participant, that of DSM aggregators/program operators, who may also be afforded an industry representative on the MAC, we acknowledge the concerns raised regarding the establishment of precedents and the potential to proliferate new rule participant classes with its associated pressure to expand MAC membership accordingly.

The proposed Amending Rules enable the IMO to increase MAC membership in recognition that existing representation does not cover the category of DSM aggregator, as well as potentially other categories of participant that may exist or eventuate within the WEM and who do not neatly fall within the market rules' existing participant classes. By enabling a valuable flexibility to fully represent all types of market participants on the MAC, the Amending Rules also help avoid the potential for any inefficient institutionalisation of new or emerging market participant categories that may not, over time, prove to have been justified.

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

DMTenergy believes that the Amending Rules would encourage investment by enabling more effective participation of new investors in traditional market activities, as well as growing investment in new types and categories of market operations. They would also help limit or remove any real or perceived discrimination in relation to particular energy options or technologies utilised by current or prospective participants.

Market objectives (a) through (e) would all be supported by the Amending Rules.

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.

DMTenergy does not envisage incurring any costs associated with the adoption of the Amending Rules.

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

DMTenergy could implement the change immediately.