
Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2010_21 Excluding Providing Price Related Standing Data to System Management

Submitted by

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Submission

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

System Management is pleased to make this submission on the

Draft Rule Change Report
Title: Excluding Providing Price Related Standing Data to System Management
Ref: RC_2010_21
Standard Rule Change Process
Date: 24 December 2010

System Management notes the minutes of the MAC meeting 32 on 13 October 2010

“The MAC agreed to progress the Rule Change Proposal, noting that it is dependent on the outcomes of the RDIWG, subsequent changes to provide System Management with this information may be required.

Action Point: The IMO to progress the Rule Change Proposal: Providing Price Related Standing Data to System Management (RC_2010_21) into the formal process.”

System Management affirms that this rule change should be progressed on this basis. That is System Management may require price data as part of the RDIWG market amendments on competitive balancing, load following and network control services. As such the philosophy of not providing System Management with commercial information put forward here may not be tenable in the future.

In addition System Management believes the following rule needs amendment.

“7.7.4A. When selecting Curtailable Loads from the Dispatch Merit Order System Management must select them in accordance with the Power System Operations Procedure, where the selection process specified in the Power System Operations Procedure must only discriminate between Curtailable Loads based on size of the capacity, response time, availability and cost of different Curtailable Loads.”

As prices will not be given to System Management the word “cost” should be replaced with “dispatch merit order”

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

System Management believes that the proposal does not show attempt to show that the proposed rule changes better facilitate the achievement of the Market Objectives

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.

This Rule Change Proposal will not involve changes to System Management’s IT or business systems.

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

The expected implementation date of this Rule Change Proposal should be achievable as there are no changes required.