

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

**RC_2010_21 Excluding Providing Price Related Standing Data to
System Management**

Submitted by

Name:	Ky Cao
Phone:	08 9420 0300
Fax:	08 9474 9900
Email:	k.cao@perthenergy.com.au
Organisation:	Perth Energy
Address:	Level 4, 165 Adelaide Tce, Perth WA 6004
Date submitted:	29 November 2010

Submission

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

Background

Clause 2.34.1 of the Market Rules currently prescribes that the Independent Market Operator (IMO) must maintain a record of all Standing Data for all Market Participants and provide the Standing Data and any revisions to System Management.

The list of items that must be included in the Standing Data is contained in a detailed list in Appendix 1 of the Market Rules. Amongst other things, Standing Data includes prices at which Market Participants are willing to increase or decrease output from their Facilities.

Rule change proposal RC_2008_04 (commenced), changed clause 2.34.12 of the Market Rules so that the IMO no longer needed to consult System Management when requesting a Market Participant to update price related Standing Data. RC_2008_04 was put forward by System Management who considered that it is not appropriate for System Management to consider Standing Data relating to pricing issues.

Change Proposal

On 15 October 2010 the IMO submitted rule change proposal RC_2010_21 “Excluding Providing Price Related Standing Data to System Management”. The IMO proposed to change clause 2.34.1 of the Market Rules so that the IMO no longer has an obligation to provide Standing Data relating to prices to System Management. This proposal was put forward to correct an oversight in the previous rule change proposal RC_2008_04.

Perth Energy’s Views

Perth Energy agrees that it is not necessary for System Management to review or to receive any Standing Data relating to pricing issues. Perth Energy therefore supports the change proposal.

In general, Perth Energy supports strict controls on access to commercially sensitive information, such as pricing information. Such information should only be made available on an as necessary basis. Perth Energy cannot see any need for System Management to be provided with this information.

Perth Energy queries whether the legal text of the rule change proposal, and indeed the legal text that was used to implement 2008_04, would benefit from substituting the reference to “Standing Data that concerns prices” with explicit references to the sub sections of Appendix 1 that should be excluded from being shared with System Management. Such a change would leave no room for interpretation as to what is “relating to prices”.

Perth Energy considers that the following sub-sections of Appendix 1 should be excluded from being shared with System Management:

- (c) and all its sub clauses
- (e) v
- (h) vi
- (i) xA
- (k) i.7
- (k) ii.2
- (l) iii.4
- (l) iii.5
- (m)

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 Market Objective¹ (a) as an unnecessary exchange of information would be avoided.

¹ The objectives of the market are:

- 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.

-
- (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.