

Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2010_34 Provision of Commissioning Information by System Management

Submitted by

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Submission

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

Background

In 2009 the Independent Market Operator (IMO) approved RC 2009 08 which introduced the concept that a new, commissioning generator could continue to conduct Commissioning Tests beyond 30 November without:

- Needing to operate in the energy market,
- Submitting Resource Plans, or
- Being subject to UDAP and DDAP payments.

At the same time, and to improve market transparency, System Management was tasked with providing information to the IMO on the Commissioning Test plans of any commissioning generator to allow the IMO to inform other Market Generators of these plans so that they can be taken into account when Market Participants make their STEM submissions.

The current wording in the Market Rules requires System Management to provide the IMO with these plans by 4.30pm for the following Scheduling Day.

Change Proposal

The Scheduling Day starts at midnight. That means that currently, Market Participants would have already made their STEM submissions for days potentially impacted by Commissioning Tests even before the deadline by which System Management must submit information to the IMO about such tests.

The IMO has proposed to change the Market Rules so that System Management must submit the Commissioning test information by 7.30am for the Trading Day *following* the current Scheduling Day. With this change Market Participants will be able to take the information into account when making STEM submissions.

Perth Energy's Views

Perth Energy agrees with the IMO's proposal. In Perth Energy's view, the IMO's proposal addresses a manifest error in the original drafting to implement the changes in RC 2009 08. To support the economic efficiency objectives embodied in Market Objective (a), it is important that the market operates with as much transparency as possible. This includes making Market Participants aware of any potential commissioning activity. Perth Energy therefore welcomes the change proposal from the IMO that will give full effect to the proposed changes from RC 2009 08 and allow Market Participants to properly take into account any impact of potential commissioning activities when making their STEM submissions.

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 Market Objectives¹ (a) and (b) as Market Participants would be afforded the opportunity to make use of the most up to date information with regard to commissioning activity when making their STEM submissions.

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.

- 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.