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## Wholesale Electricity Market Rule Change Proposal Submission Form

### RC\_2012\_03: Assignment of Capacity Credits to Network Control Service Facilities

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#### Submitted by

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#### Submission

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

EnerNOC supports the proposal. The problems identified with the current interaction between Network Control Services (NCS) and the Reserve Capacity Mechanism (RCM) are real. Resolving them, as proposed, should make it more likely that an NCS arrangement will occur.

Our view is that all of the following cases should be allowed:

1. If an NCS Facility is able to provide Reserve Capacity, then it should receive Capacity Credits for doing so.
2. An NCS Facility should be able to provide NCS as soon as it is needed, independent of the dates associated with RCM cycles.
3. If an NCS Facility can satisfy Western Power's needs, but for some reason – e.g. fuel requirements, notice periods, or dispatch hours – cannot provide Reserve Capacity, then it should be allowed to provide NCS without any interaction with the RCM.

4. An NCS Facility should be able to provide different amounts of capacity into the NCS and into the RCM. This would typically be the case where an aggregated facility that is already providing Reserve Capacity begins to provide NCS, but only some of its constituent sites are in the correct network area to provide NCS.<sup>1</sup>

The current proposal appears to allow for all these cases.

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

EnerNOC believes that, by facilitating the use of NCS arrangements, resulting in new capacity entering the market while avoiding or deferring network infrastructure spending, the change would further all five Wholesale Market Objectives.

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**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.**

The implementation costs for EnerNOC would be negligible.

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

The change could be implemented immediately.

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<sup>1</sup> An alternative, and arguably more elegant, approach would be to treat NCS and RCM facilities as completely independent entities, and allow sites to be a member of a maximum of one NCS facility and one RCM facility. However, it seems likely that this would require more extensive rule (and possibly system) changes than the approach proposed here.