
Wholesale Electricity Market Rule Change Proposal Submission Form

<RC_2012_04 Consequential Outage Correction>

Submitted by

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Date submitted:	17 July 2012

Submission

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

Verve Energy supports the Rule Change Proposal as modified by the Independent Market Operator (IMO) following the first submission period and presented in the Draft Rule Change Report.

However, in reviewing the Draft Rule Change Report, Verve Energy has identified the following minor issues for further consideration by the IMO.

List of equipment subject to Outage Scheduling

In response to issue 2 of the submissions received during the first submission period the IMO noted:

“...that network equipment (both transmission and distribution) that is likely to impact on generation capacity should be included on the Equipment List so as to be subject to the Outage Planning process...”

Clause 3.18.2(c) of the Wholesale Electricity Market Rules (Market Rules) outlines what must be on the list of equipment on the SWIS required to be subject to outage scheduling by System Management. Specifically, sub clause 3.18.2(c)iv provides for:

“any other equipment that System Management determines must be subject to outage scheduling to maintain Power System Security and Power System Reliability”

Verve Energy questions whether sub clause 3.18.2(c)iv is sufficient to meet the IMO's intention, as outlined in its response to issue 2 of the submissions received during the first submission period, or whether the reference to "maintain Power System Security and Power System Reliability" makes this criteria too narrow. For example, there may be a piece of distribution network equipment which, if on an outage, may impact on generation capacity, however does not affect System Management's ability to maintain Power System Security and Power System Reliability.

Consequential amendment to clause 3.19.2 of the Market Rules

Verve Energy notes the addition of sub clause 3.18.6(h) which requires a confirmation from a Network Operator that it has provided sufficient notification to any impacted Market Generators prior to requesting a Planned Outage. Verve Energy questions whether this new sub clause 3.18.6(h) should be excluded from what a Network Operator is required to provide when requesting Opportunistic Maintenance under clause 3.19.2 of the Market Rules.

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

Verve Energy agrees with Tesla Corporation's assessment that the Rule Change Proposal would improve Wholesale Market Objectives (a) and (d).

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.

Verve Energy would not require any changes to its IT or business systems, nor incur any organisation costs as a consequence of adopting the changes (either as proposed by Tesla Corporation or modified by the IMO in its Draft Rule Change Report).

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

Verve Energy does not need to undertake any actions to implement this Rule Change Proposal.
