
Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2012_07 Loss Factor Determination

Submitted by

Name:	John Rhodes
Phone:	6212 1138
Fax:	
Email:	John.Rhodes@synergy.net.au
Organisation:	Synergy
Address:	228 Adelaide Terrace Perth 6000
Date submitted:	22 January 2013

Submission

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

Synergy supports proposed rule change RC_2012_07 which acts to correct a number of discrepancies between clause 2.27 of the rules, the Market Procedure for Determining Loss Factors and current practice and as a result improves the efficiency and transparency of the process by which loss factors are determined. In particular, Synergy supports the clarification of the loss factor applicable to the Notional Wholesale Meter (NWM) and the process by which it is calculated.

What follows are suggested changes to the proposed specific amendments to the rules relating to definitional consistency and minor typos:

Definitions	Comment
Proposed clauses 2.27.1(a) and 2.27.12 refer to a Network Operator's Network using the capitalised form of network, making it defined term as listed in chapter 11 of the rules.	Consistency suggests that similar references to network in proposed clauses 2.27.4 and 2.27.13 should also be capitalised.
Proposed clause 2.25(e)(ii) in defining the Distribution Loss Factor Class that Western Power must assign to the NWM refers only to Non-Dispatchable Loads not equipped with an interval meter.	Consistency with clause 9.3.4A and improved definitional clarity suggest that this definition should be extended to include the following: "...or with meters not read as interval meters that are served by Synergy...".
Proposed clauses 2.27.7 and 2.27.11	Consistency with steps 2.2.2 and 2.3.2 of the

impose obligations on the IMO to publish certain information as soon as practicable after receiving from Network Operator(s).

proposed Market Procedure: Determining Loss Factors – Version 2 which impose an obligation on the IMO to publish such information referred to in proposed clauses 2.27.2 and 22.27.11 by no later two Business Days after receiving it suggests that this obligation should be included in those proposed rule clauses. To do so would provide a head of power in the rules with regard to the obligation to publish the relevant information within the two Business Days of its receipt which could then be relied upon in the proposed procedure.

Typos	Comments
Proposed clause 2.27.16 makes reference to 2.27.15(d).	Suggest the reference should be 2.27.15(e) as this clause imposes the obligation on the Network Operator to provide the recalculated Transmission or Distribution Loss Factor to the IMO.
Proposed clause 9.3.4A(b) makes references to clauses 9.3.4A(i) and 9.3.4A(ii).	Suggest the reference should be 9.3.4A(b)(i) and 9.3.4A(b)(ii).

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

Synergy believes that the proposed amendments, through

- (i) streamlining the calculation of loss factors by eliminating the requirement to calculate superfluous loss factors (i.e. requirement to calculate loss factors for each non-interval metered load);
- (ii) restricting the mandatory calculation of a specific loss factor to each non-dispatchable load above 7MVA peak consumption, noting that the proposed Loss Factor Procedure provides for a Market Participant to request at its expense the calculation of a specific loss factor for loads below this level but greater than 1MVA; and
- (iii) clarifying the definition and calculation of the loss factor applicable to the NWM

will better achieve Wholesale Market Objective (a) which is to promote the economically efficient production and supply of electricity in the SWIS.

-
- 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.**

Synergy notes that the proposed change will have negligible impact on its business or IT systems.

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

Synergy could implement this proposed rule change immediately.