

---

---

## Wholesale Electricity Market Rule Change Proposal Submission Form

### RC\_2012\_11 Transparency of Outage Information

---

---

#### Submitted by

<b>Name:</b>	John Rhodes
<b>Phone:</b>	6212 1138
<b>Fax:</b>	
<b>Email:</b>	John.Rhodes@synergy.net.au
<b>Organisation:</b>	Synergy
<b>Address:</b>	228 Adelaide Terrace Perth 6000
<b>Date submitted:</b>	26 October 2012

---

---

#### Submission

---

---

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

Synergy supports the IMO's decision to accept the proposed rule change, RC\_2012\_11, which acts to improve the transparency and access to outage information. Synergy agrees with the IMO that increased transparency of outages:

- (i) will promote more efficient decision making by market participants in regard to making plant available at times of perceived short term supply constraints;
- (ii) will ultimately translate into improved pricing outcomes for customers; through more competitive supply offerings and
- (iii) better achieve markets objectives (a) and (d) through improved plant dispatch efficiencies and through reductions in cost of electricity supplied to customers.

#### **Current outage data is limited**

Currently, market rule 10.5.1 (zD) requires the IMO to make available from the Market Web Site schedules of Available Outages after those items of information become available to the IMO. It is Synergy's understanding that this proposed rule change will oblige the IMO to provide **all** types of outage related information to the market as soon as it becomes available to the IMO.

This is a clear improvement in both the level of outage information available to the market and the timeliness of the availability of that information to the market.

Together, these new requirements represent a higher standard of disclosure and Synergy views this as important step in the on-going journey of improving transparency within the market.

### **Publishing commercially sensitive information**

Synergy notes that concern was raised about whether some of the information required to be published pursuant to this rule change could be considered to be commercially sensitive and therefore disadvantage its provider or lead to a diminution in the quality and even timeliness of the information that participants provide. In this regard, the IMO has sought the views of participants, specifically related to new clauses 7.13.1E and 7.13.1G, which may serve as a basis on which the IMO may respond to or deal with the concerns. Synergy's views about the information to be provided by System Management to the IMO under these clauses are as follows:

#### **7.13.1E**

System Management must in a timely fashion supply Outage Plan information (clause 3.18.6) and state whether it relates to a Scheduled Outage or Opportunistic Maintenance, receipt timestamp, amendment and approval timestamps and actual start and end dates if different from that disclosed initially disclosed in 3.18.6 – Synergy's view is that nothing about this information could reasonably be characterised as being confidential such that its disclosure creates sufficient commercial disadvantage to the providing participant that would exceed the benefit to the wider market of being able to react to this information and adjust plans to make energy when its needed to compensate for the potential reduction of same inherent the Outage Plan.

#### **7.13.1G**

System Management must in a timely fashion supply information in respect of notified Forced and Consequential Outages (clause 3.21.4) as well as new or amended information in respect of same and state whether it relates to a Forced or Consequential Outage, receipt timestamps, amendment timestamps and the actual outage end time if different from the initial estimate – Synergy's view about of the information System Management must supply in respect of these items is no different from that outlined above for 7.13.1E.

### **Immediacy is fundamental to effective transparency**

In a market based around gate closures, i.e. there is a reducing window to react to information, efficiency is maximised by the earliest possible publication of new information that can affect outcomes. In regard to outages, Synergy interprets this to mean that information about outages, including changes to initially advised information, should be made published to the market as soon as practically possible after System Management/IMO become aware of it. Accordingly, Synergy agrees with the IMO's position that it would be inappropriate to amend clause 7.13.1F such that the requirement for System Management to supply information in relation to an outage be delayed until receipt of the full and final details of the outage. Furthermore, Synergy supports the proposed introduction of new clause 10.5.3 which

obliges information supplied by System Management under clauses 7.121E and 7.13.1G, to be published by the IMO as soon as practicable after its receipt.

### **Outage information availability**

Synergy notes the IMO's careful consideration of implementation options and associated costs with the IMO deciding in favour of publishing real time outage information on the MPI with aggregated outage files periodically available via csv download from the IMO's market website. Synergy supports the IMO decision to proceed with making real time outage information available, as much as it is practical to do so, as a key initiative to improve outage transparency.

However, while there is some merit in providing a relatively comprehensive interface with the MPI with which to interrogate the available information, Synergy strongly suggests that equal consideration be given to making the information available through the market's report interface for download via web services. Synergy's view is providing outage information via the report interface will enable participants to automatically download information when needed or periodically, so that the most recent information is always available to participants in a format which allows it to be arranged, queried and presented in the participant's own systems so as to suit the operational and risk management needs of the participant.

### **Staged implementation**

Synergy notes that the proposed rule change has the general support of the MAC and of the majority of first round submissions and accordingly considers that there is merit in proceeding with implementation in a time efficient manner so that the benefits of improved outage transparency can begin to flow to the market. Given the proposed implementation date is July 2014, more than 18 months into the future, Synergy requests the IMO to consider whether a staged implementation is possible. Synergy recognises that this would require negotiation between the IMO and System Management, noting that System Management's primary attention is focused on delivering its SMARTS systems, but nevertheless takes the view that it would be worth exploring whether a staged implementation was feasible, for example whether clauses 7.13.1D and 7.13.1E could be implemented ahead of clauses 7.13.1F and 7.13.1G.

---

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

Synergy's view outlined in its first round submission remain unchanged; that is proceeding with RC\_2012\_11 will better achieve 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.**

Synergy expects that it will incur some IT implementation costs as a result of this rule change proceeding. The nature, extent and cost of those changes will depend on in what format the IMO makes the outage information available.

---