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## Wholesale Electricity Market Rule Change Proposal Submission Form

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

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#### Submitted by

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#### Submission

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

Verve Energy is supportive of the Independent Market Operator's (IMO's) Rule Change Proposal to facilitate greater transparency in regards to outage information, provided that:

- commercially sensitive information is not disclosed; or
- the increased transparency of information does not reduce the quality of information that participants provide to System Management. If this were to be the case, it may lead to inefficiencies for System Management in undertaking its role in the outage planning process.

In reviewing the IMO's Rule Change Proposal, Verve Energy questions whether new clauses 7.13.1D – 7.13.1G are contained in the most appropriate section of the Wholesale Electricity Market Rules (Market Rules). The reason for this is section 7.13 of the Market Rules covers the settlement and monitoring data transfer from System Management to the IMO in regards to dispatch. Verve Energy notes that schedules of Planned Outages, Forced Outages and Consequential Outages are needed for settlement, however, this is already taken into account in the current drafting of clause 7.13.1A(a). Verve Energy considers that the publication of the more detailed outage information as suggested in this Rule Change Proposal is not used for dispatch settlement or dispatch monitoring, as such Verve Energy suggests that the IMO review the drafting to ascertain whether there is a more appropriate section in the Market Rules.

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

Verve Energy considers that the proposal is consistent with the 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.**

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.

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**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.

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