

## RC\_2012\_12 Updates to Commissioning Test Plans

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### Submitted by

<b>Name:</b>	Steve Gould
<b>Phone:</b>	0408 005 321
<b>Fax:</b>	NA
<b>Email:</b>	<a href="mailto:steve@eurekaelectricity.com">steve@eurekaelectricity.com</a>
<b>Organisation:</b>	Community Electricity
<b>Address:</b>	GPO Box 909 West Perth 6872
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### Submission

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

Community Electricity supports the Rule Change Proposal on the grounds that it removes provisions within the Market Rules that require participants to serve the rules rather than the rules serving the market. In general, the Market Rules should establish a framework within which System Management and Market Participants are required to cooperate as reasonable and prudent persons and optimise commissioning requirements having proper regard to the technical and commercial needs of the participant and the consequential costs and risks born by other participants and the market generally. Retention of an obligation to serve the rules as an end in itself is also inefficient and adds unnecessary expense. From this perspective, we welcome the reduction of the 20 day notice period to 7 days and the additional flexibility for System Management to approve lesser periods where it reasonably can, and to withdraw prior approvals where system conditions require it to.

We further support the principle that civil penalties should be used only to enforce material provisions of the Market Rules. On that basis, we support removal of civil penalties in respect of breaching the 'timing' provisions as it is inappropriate to apply them where there is not only no material consequence, but not even a controversy between the affected parties.

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

Community considers that the Rule Changes improve achievement of Market Objectives (a) (to promote the economically efficient, safe and reliable production and supply of

electricity and (d) (to minimise the long-term cost of electricity). We also consider them to be consistent with the other 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**

Not applicable

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

Not applicable

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