
Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2012_12 Updates to Commissioning Test Plans

Submitted by

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Date submitted:	30 August 2012

Submission

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

Synergy supports RC_2012_12 which acts to allow a Market Participant to request approval of a Commissioning Test Plan and a revision to its original Commissioning Test Plan within a shorter period than the current 20 day minimum provided in the Market Rules.

Synergy considers that the changes will remove the current disconnect between the Market Rules, which mandates that a Commissioning Test Plan must be submitted to System Management 20 days prior to the start date and the Power System Operation Procedure (PSOP): Commissioning and Testing, which gives System Management the discretion to consider a Commissioning Test Plan submitted within the 20 day limit but also requires System Management to notify the IMO of a breach, if it approves such a Commissioning Test Plan.

Synergy also supports the proposal retaining the civil penalty in clause 3.21A.2 but have it apply in circumstances where a Market Participant has elected to undertake commissioning tests other than under a Commissioning Test Plan approved by System Management. In Synergy's view, this clearly signals the importance the market places on all participants cooperating with System Management, through an approval process where appropriate, so that the security of the system is maintained and electricity is produced at the lowest cost through the efficient dispatching of plant and timely scheduling of ancillary services.

Further, providing for Commissioning Test Plan applications to be made as earlier as 7 days prior to the start date and for revisions to existing Commissioning Test Plans to be made closer to real time but simultaneously retaining the right for System Management to reject such requests where it determines that it has insufficient time for proper consideration (where such request was received within the 20 day period) delivers the flexibility requested by

participants while ensuring the approval process retains the degrees of freedom necessary to safeguard the security of the system.

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

This rule change, through improving the Commissioning Test Plan request process timeframe, will better achieve the WEM objective (a), through efficiency improvements to the outage scheduling process such that participants can undertake Commissioning Tests in a more timely manner which should result in the earlier and improved availability of generating facilities.

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 believes that this rule change will result limited or negligible impact on its IT or business systems.
