



Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2012_22 Commitment and De-commitment Notification Requirements

Submitted by

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Submission

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

Verve Energy supports the intent of the Independent Market Operator's amendments to the Rule Change Proposal following the first submission period, as presented in the Draft Rule Change Report.

Generally, Verve Energy considers it appropriate to create governance frameworks to administer exemption and/or approval processes, provided the proposed frameworks are not more onerous than the original issue being resolved.

In this instance, Verve Energy considers that the proposed governance framework for an exemption for a Scheduled Generator connected to the distribution network from having to confirm with System Management its intent to synchronise or desynchronise, where an electrical signal via Western Power Networks already exists, is appropriate.

However, in noting this support, Verve Energy requests that the Independent Market Operator reconsider its decision for exemption details to be published on System Management's website. Verve Energy agrees that there may be value in publishing such details, but questions whether System Management's website is the most appropriate place to do so. There are numerous examples in the Wholesale Electricity Market Rules where System Management's assessments and/or decisions are published on the Market Web Site,

and Verve Energy does not see why this process should differ from the norm. Such examples are:

- Clause 2.10.2A: Where System Management has decided not to amend or replace a Market Procedure, the reasons for this decision must be published on the Market Web Site;
- Clauses 2.13.6D(b), 2.13.6E(b) and 2.13.6J: System Management to determine the Tolerance Range and/or a Facility Tolerance Range(s) and provide to the IMO for publication on the Market Web Site; and
- Clause 3.18.2: System Management to compile and maintain the list of equipment subject to outage scheduling. This list is to be provided to the IMO for publication.

As such, Verve Energy considers that the exemption details contemplated by this Rule Change Proposal should be published on the Market Web Site rather than System Management's website.

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

As outlined in its submission from the first submission period, Verve Energy considers that the proposal will have the following impact on the Wholesale Market Objectives:

Wholesale Market Objective	Comments
(a) to promote the economically efficient, safe and reliable production and supply of electricity and electricity related services in the South West interconnected system.	Verve Energy considers that the proposal allows for a more efficient management of the commitment and de-commitment process for both Scheduled Generators and System Management, which in turn should promote the economically efficient production and supply of electricity. Further, Verve Energy considers that the Rule Change Proposal may promote the safe and reliable production and supply of electricity by ensuring that Market Participant and System Management resources are not being diverted to undertake unnecessary activities.
(d) to minimise the long-term cost of electricity supplied to customers from the South West interconnected system.	Verve Energy considers that the impacts on Wholesale Market Objective (a) (as outlined above) potentially lead to the minimisation of the long term cost of electricity supplied.

Verve Energy considers that the Rule Change Proposal does not impact the remaining Wholesale Market Objectives.

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.

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.
