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**Wholesale Electricity Market  
Rule Change Proposal Submission Form****RC\_2012\_22: Commitment and De-commitment Notification  
Requirements**

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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.**

**Background**

Under clauses 7.9.1 and 7.9.5 of the Wholesale Electricity Market Rules (Market Rules) Market Generators are required to inform System Management of their intention to synchronise/de-synchronise from the network an hour in advance. Given the importance of this requirement from a safety perspective failure to comply with these requirements can potentially result in a Civil Penalty being applied.

System Management notes that the mechanism for providing notification differs for generators depending on which network they are connected to:

- Transmission connected – notification typically provided by telephone
- Distribution connected – an electrical signal is provided by Western Power to indicate the generator can connect. Safety issues will result in the signal being turned off.

In the case of distribution connected generation, System Management considers that as the notification is provided electronically by Western Power it is unnecessary for a separate notification to also be given to System Management. System Management proposes to create a discretion in the Market Rules to enable it to remove the requirement for a

notification to be provided by a distribution connected generator where it is satisfied that safe operating equipment and procedures are in place. System Management also proposes an ability to remove this exemption.

### **Alinta's views**

Alinta supports System Management's proposed removal of unnecessary obligations on distribution connected generation particularly given that non-compliance could attract the application of a Civil Penalty. Alinta encourages the IMO to propose in its Draft Rule Change Report more succinct drafting to that presented in the Rule Change Proposal.

Alinta does however query whether the proposed ability for System Management to exempt a generator from the requirement to provide notification of synchronisation/de-synchronisation could be further extended to transmission connected generation. Further details of Alinta's views are outlined below.

### ***Transmission connected generators***

The new Balancing market operates via System Management issuing multiple advanced instructions to Market Generators to vary the output or consumption of their facilities by issuing Dispatch Instructions, Operating Instructions and instructions under clause 7.6A.3(a) ("Instructions"). Instructions to generators include, amongst other things, details of the time that the Facility will be required to commence operating at a specified ramp rate (or commence responding to the Operating Instruction). There are strict requirements for Market Generators to comply with Instructions and provide notifications to System Management where they will be unable to do so.

As a consequence of the new market design there are unlikely to be any circumstances where a generator is synchronising/de-synchronising to the network and System Management is not already aware, except where a generator is non-compliant with the Market Rules<sup>1</sup>. System Management can surmise when a Facility will be connecting to the network, including details around the time of connection, from the Instructions it has provided. Market Generators are simply notifying System Management of the commitment information that is consistent with the Instruction it has received from System Management.

Under clauses 7.9.2 and 7.9.6 of the Market Rules, an exemption to the one hour notification requirements for synchronisation/de-synchronisation is currently provided where the behaviour has been requested to occur within one hour of the Instruction being issued. Alinta considers it is an unnecessary duplicate step for a notification under clauses 7.9.1 and 7.9.5 to be provided at all where an Instruction has been issued by System Management under the Market Rules.

Alinta suggests that the IMO review the obligations outlined in section 7.9 of the Market Rules in light of the new Balancing market design and with a view to remove unnecessary duplicate process steps.

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<sup>1</sup> Non-compliance with the requirements associated with confirming receipt and adhering to instructions issued by System Management can potentially attract Civil Penalties (i.e. clauses 7.6A.2(g), 7.6A.3(c), 7.6.2(b)(i), 7.7.6A).