



INDEPENDENT
MARKET
OPERATOR

Draft Rule Change Report

Title: Commitment and De- commitment
Notification Requirements

RC_2012_22

Standard Rule Change Process

Date: 21 March 2013

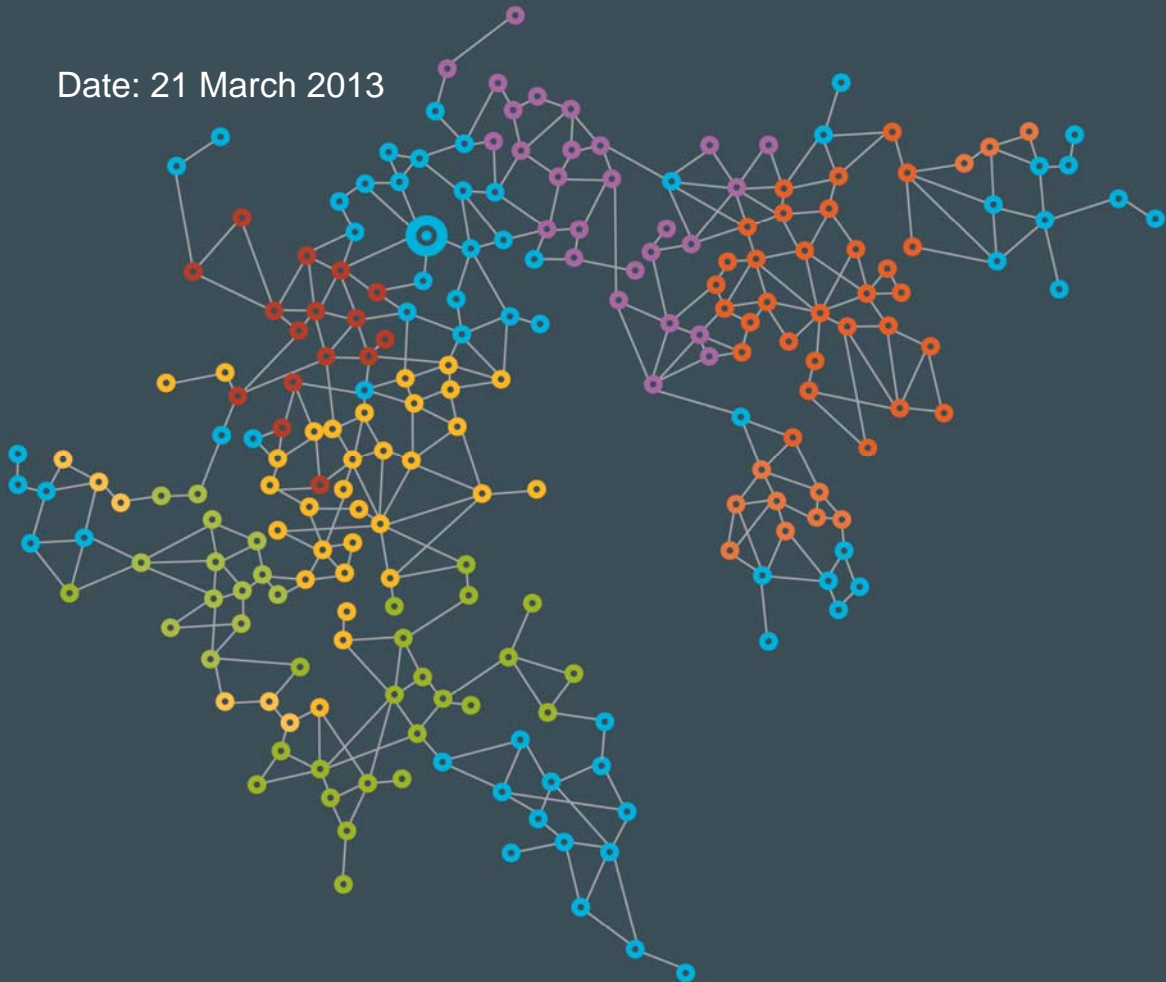


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Executive Summary

Proposed amendments

System Management submitted the Rule Change Proposal: Commitment and Decommithment notification requirements (RC_2012_22) to address an issue in the Wholesale Electricity Market Rules (Market Rules) where an unnecessary obligation of notification is placed on a Market Participant that has a Scheduled Generator connected to a distribution network. System Management observed that distribution connected generators are provided an electrical signal by Western Power Networks that only allows the generator to connect to the power system if it is safe to do so. System Management considered that such generators should be able to apply for an exemption from the requirements in clauses 7.9.1 and 7.9.5 and System Management should be able to grant or revoke an exemption by testing for safe operating equipment and procedures.

Consultation

The Pre Rule Change Proposal was discussed at the Market Advisory Committee (MAC) at its 14 November 2012 meeting, where MAC members agreed that the proposal should be submitted into the formal process after reviewing the drafting of proposed Amending Rules.

The first submission period for this Rule Change Proposal was held between 14 December 2012 and 6 February 2013. Submissions were received from Alinta, Community Electricity, Perth Energy, Tesla Corporation and Verve Energy.

All submitters supported the Rule Change Proposal on the grounds that superfluous obligations should be removed as long as their removal does not put system security under any risk. Additionally, Alinta queried whether the exemption could be extended to transmission connected generators and Perth Energy queried how System Management would monitor ongoing compliance with the exemption. The IMO has provided responses to issues and suggestions in section 4.3 of this report.

Assessment against Wholesale Market Objectives

The IMO considers that the proposed amendments will better achieve Wholesale Market Objective (a) and (d) and are consistent with the remaining Wholesale Market Objectives.

Practicality and cost of implementation

The IMO has not identified any costs associated with implementing this proposal.

The IMO has identified that the Power System Operation Procedure for Dispatch will need to be updated to document processes followed in applying, granting, revoking and monitoring the exemption. The IMO has not identified any other issues with the practicality of implementation of the Rule Change Proposal.

The IMO proposed decision

The IMO's proposed decision is to accept the Rule Change Proposal as modified following the first submission period.

Next steps

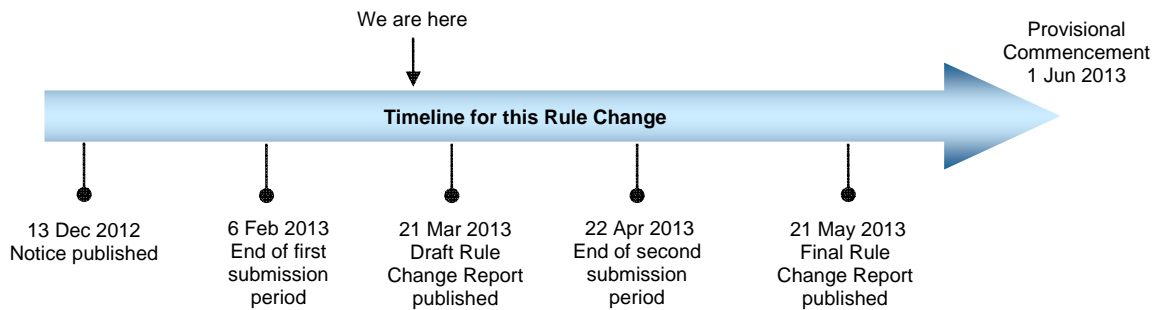
The IMO now invites interested stakeholders to make submissions on this Draft Rule Change Report by **5:00 pm on Monday, 22 April 2013**.

1. Rule Change Process and Timetable

On 11 December 2012 System Management submitted a Rule Change Proposal regarding amendments to clauses 7.9.1, 7.9.5 and new clauses 7.9.2A and 7.9.6B of the Wholesale Electricity Market (WEM) Rules (Market Rules).

This proposal is being processed using the Standard Rule Change Process, described in section 2.7 of the Market Rules. In accordance with clause 2.5.10 of the Market Rules, the IMO decided to extend the timeframe for preparation of the Draft Rule Change Report. Further details of the extension are available on the Market Web Site: http://www.imowa.com.au/rc_2012_22.

The key dates in processing this Rule Change Proposal are:



Please note that the commencement date is provisional and may be subject to change in the Final Rule Change Report.

2. Call for Second Round Submissions

The IMO invites interested stakeholders to make submissions on this Draft Rule Change Report. The submission period is 20 Business Days from the publication date of this report. Submissions must be delivered to the IMO by **5.00pm on Monday, 22 April 2013**.

The IMO prefers to receive submissions by email (using the submission form available on the Market Web Site: <http://www.imowa.com.au/rule-changes>) to: market.development@imowa.com.au

Submissions may also be sent to the IMO by fax or post, addressed to:

Independent Market Operator

Attn: Group Manager, Development Capacity
PO Box 7096
Cloisters Square, PERTH, WA 6850
Fax: (08) 9254 4399

3. Proposed Amendments

3.1. The Rule Change Proposal

System Management submitted this Rule Change Proposal to address an issue in the Market Rules where an unnecessary obligation of notification is placed on Market Participants that have a



Scheduled Generator connected to a distribution network.

Under clauses 7.9.1 and 7.9.5, Market Participants intending to synchronise or desynchronise a Scheduled Generator must confirm the expected time of synchronisation or desynchronisation with System Management. This is required so that equipment ratings are not exceeded and there is no possibility of energising a system being worked on.

For Scheduled Generators connected to a transmission network, this notification is typically provided by telephone to enable a check of the impact of the synchronisation or desynchronisation by the generator.

For Scheduled Generators connected to a distribution network, this notification is provided automatically via an electrical signal from Western Power Networks that allows the generator to synchronise or desynchronise without the need for a manual notification. However, in accordance with clauses 7.9.1 and 7.9.5, the generator would still be required to provide a separate confirmation to System Management. Market Participants are subjected to civil penalties for contravening these clauses.

System Management has proposed that Market Participants that have Scheduled Generators connected to a distribution network and are able to satisfy System Management that safe equipment and operating procedures exist for synchronisation or desynchronisation should be able to be exempt from the requirement to notify System Management.

For full details of the Rule Change Proposal please refer to the Market Web Site: http://www.imowa.com.au/rc_2012_22

3.2. The IMO's Initial Assessment of the Rule Change Proposal

The IMO decided to proceed with the proposal on the basis that Rule Participants should be given an opportunity to provide submissions on the Rule Change Proposal.

4. Consultation

4.1. The Market Advisory Committee

Mr Brendan Clarke presented an overview of System Management's Pre Rule Change Proposal at the Market Advisory Committee (MAC) at its 14 November 2012 meeting. The following points were raised during the ensuing discussion:

- Mr Nenad Ninkov queried whether it was equitable to treat transmission and distribution generators differently. Mr Clarke responded that the two were already treated differently in the Technical Rules.
- Mr Ninkov queried what the maximum sized generator was which could connect to the distribution network. Mr Clarke responded that the generators which are currently connected are around 10 MW although there is one large alumina refinery connected to the distribution network as well.
- Ms Jenny Laidlaw queried whether the permission to synchronise without prior notification given by System Management could ever be reversed. Mr Clarke agreed that it could.
- Mr Peter Huxtable queried whether there was a penalty if a generator's control system fails. Mr Clarke responded that there was no penalty under the Market Rules but that they may exist under the Access Code.

- Mr Ninkov queried what the motivation was for this proposal. Mr Clarke responded that the motivation was to remove a superfluous requirement that exists for both Market Participants and System Management. Mr Andrew Stevens noted that any instances where System Management removes unnecessary compliance obligations should be encouraged and supported.
- Ms Jenny Laidlaw noted that minor amendments to the drafting were required, for example, to provide System Management with the ability to withdraw its permission for a Facility to commit or de-commit without prior notification.

The MAC agreed that the Rule Change Proposal should be submitted into the formal process after making changes to the drafting of the Amending Rules.

Further details are available in the MAC meeting minutes available on the Market Web Site: <http://www.imowa.com.au/MAC>

4.2. Submissions received during the first submission period

The first submission period for this Rule Change Proposal was between 14 December 2012 and 6 February 2013. The first submission period was extended to 35 days to account for Christmas holidays. Submissions were received from Alinta, Community Electricity, Perth Energy, Tesla Corporation and Verve Energy.

All submitters supported the Rule Change Proposal on the grounds that superfluous obligations should be removed as long as their removal does not put system security under any risk.

Additionally, Alinta queried whether the proposed exemption could be further extended to transmission connected generators in light of the new Balancing Market design where System Management issues multiple advanced instructions and Facilities must comply with those instructions.

Perth Energy highlighted that reduction in red tape must not be achieved by compromising system security. Perth Energy queried how System Management would monitor ongoing compliance of the generation system with the exemption.

Submitter	Wholesale Market Objective Assessment
Alinta	None provided.
Community Electricity	Improves the integrity of the Market Rules and is consistent with the Wholesale Market Objectives.
Perth Energy	Better achieves Wholesale Market Objective (a) and has not identified any impacts on the remaining Wholesale Market Objectives.
Tesla Corporation	Better achieves Wholesale Market Objectives (b) and (c) and is consistent with the remaining Wholesale Market Objectives.
Verve Energy	Better achieves Wholesale Market Objectives (a) and (d) and does not impact the remaining Wholesale Market Objectives.

A copy of all submissions in full received during the first submission period is available on the Market Web Site: http://www.imowa.com.au/rc_2012_22

4.3. The IMO's response to submissions received during the first submission period

The IMO's response to each of the issues identified during the first submission period is presented in the table over the page:

	Submitter	Comment/Change Requested	IMO's Response
1.	Alinta	<p>Alinta queries whether the proposed ability for System Management to exempt a generator from the requirement to provide notification of synchronisation/ de-synchronisation could be extended to transmission connected generation.</p> <p>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"). 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.</p> <p>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.</p>	<p>The IMO notes Alinta's suggestion but considers that this exemption should not be extended to transmission connected generators because of their potential impact on the power system.</p> <p>In situations where the generator is operationally controlled by System Management (for example, through the use of an Automatic Governor Control), the need for a separate notification to System Management may not arise. In such cases, System Management may exempt the Market Participant because adequate communication and control systems exist¹. However, when such equipment does not exist, System Management's ability to control the effect of the connecting generator, on the power system, is greatly reduced. This poses a risk to power system security that must be mitigated. Clause 7.9 exists for that purpose.</p> <p>It is important to note that in the case of a distribution connected generator connecting to the power system, the risk to system security is minimal because of the electrical "enable" signal provided by Western Power Networks that only allows the generator to connect when it is safe to do so. The IMO understands that this protection is not available in the case of transmission connected generators. The proposed amendments are designed to offer an exemption only in cases where System Management is satisfied that equipment and processes exist which will allow the distribution connected generator to synchronise or desynchronise</p>

¹ Power System Operation Procedure (PSOP): Dispatch authorises System Management to grant an exemption to a Balancing Facility if the Facility is operated by System Management pursuant to clause 7.8 of the Market Rules.

	Submitter	Comment/Change Requested	IMO's Response
			only when it is safe to do so.
2.	Alinta	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. 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.	The IMO considers that it is erroneous to assume that changes in synchronisation/desynchronisation are unlikely to happen after a Dispatch Instruction or Operating Instruction has been issued. The IMO considers that the Market Rules contemplate situations where deviations from Operating or Dispatch Instructions can occur and therefore, necessitate the requirement for generators to communicate with System Management regarding deviations. Besides, as described in the response to issue 1, the risk to system security is much greater in the case of transmission connected generators.
3.	Alinta	Alinta encourages the IMO to propose more succinct drafting to that presented in the Rule Change Proposal.	The IMO acknowledges Alinta's suggestion and has proposed further amendments.
4.	Perth Energy	Perth Energy therefore queries how System Management intends to monitor the ongoing compliance of the systems of the affected distribution connected Scheduled Generators that may be exempted from the requirements of clauses 7.9.1 and 7.9.5 if this proposed rule change were to be implemented. Perth Energy notes that new clauses 7.9.2A and 7.9.6B both refer to "if System Management is no longer satisfied that safe operating equipment and procedures are in place, then it must advise in writing that a Market Participant is required to confirm the expected time of synchronisation / de-synchronisation...".	The IMO notes this suggestion and agrees that a compliance regime should be implemented to ensure that the exemption remains valid and current. The IMO considers that details on how to apply for exemption, how System Management should grant/ revoke it and how the exemption will be monitored should be included in the Power System Operation Procedure: Dispatch. The IMO has proposed further amendments to the Amending Rules to implement this suggestion.

	Submitter	Comment/Change Requested	IMO's Response
5.	Perth Energy	Perth Energy suggests that a requirement should be placed upon Market Participants with distribution connected Scheduled Generators to notify System Management as soon as they become aware of anything that may adversely impact on the operating equipment and procedures that are referred to in clauses 7.9.2A and 7.9.6B.	<p>The IMO appreciates Perth Energy's suggestion. The IMO has considered the issue of relaying information to System Management in situations such as :</p> <ul style="list-style-type: none"> the electrical "enable" signal malfunctions so that the generator is unable to connect when it should have² or the generator is able to connect when it should not have³; or safe operating procedures have not been followed⁴ such as unscheduled work is being undertaken on equipment. <p>The IMO considers that the Market Rules should allow for information to be relayed to System Management even though the likelihood of occurrence of such events is minimal. The IMO considers that the Market Participant should be responsible for information to be delivered to System Management as soon as it becomes aware of an equipment malfunction or violation of safety protocol. The IMO has suggested additional amendments to reflect this obligation.</p>

² This situation would amount to a Consequential Outage for the generator.

³ The likelihood of this situation occurring in practice and affecting power system security is minimal because of equipment safe-guards.

⁴ The likelihood of this situation occurring in practice is minimal because of safety equipment and protocols in place.

4.4. Public Forums and Workshops

No public forums or workshops were held with regard to this Rule Change Proposal.

5. The IMO's Draft Assessment

In preparing its Draft Rule Change Report, the IMO must assess the Rule Change Proposal in light of clauses 2.4.2 and 2.4.3 of the Market Rules.

Clause 2.4.2 outlines that the IMO *“must not make Amending Rules unless it is satisfied that the Market Rules, as proposed to be amended or replaced, are consistent with the Wholesale Market Objectives”*.

Additionally, clause 2.4.3 states, when deciding whether to make Amending Rules, the IMO must have regard to the following:

- any applicable policy direction from the Minister regarding the development of the market;
- the practicality and cost of implementing the proposal;
- the views expressed in submissions and by the MAC; and
- any technical studies that the IMO considers necessary to assist in assessing the Rule Change Proposal.

The IMO notes that there has not been any applicable policy direction from the Minister or any technical studies commissioned in respect of this Rule Change Proposal. A summary of the views expressed in submissions and by the MAC is available in section 4 of this report.

The IMO's assessment is outlined in the following sub-sections.

5.1. Further consideration of issues

The IMO has considered additional issues relating to the Rule Change Proposal and has proposed certain amendments:

1. *Exemption to be valid in both or neither of synchronisation and de-synchronisation situations:*

The IMO has clarified with System Management that the operating equipment (i.e., the electrical signal) works in such a way that both or neither of synchronisation and desynchronisation will be allowed. This implies that an exemption from notifying synchronisation can also be extended to desynchronisation. Further, this also implies that revocation of exemption for one can be extended to the other. This allows for potentially succinct drafting by combining the proposed amendments for the two situations. The IMO has proposed further amendments to the proposed Amending Rules based on this line of thought.

2. *Publication of the list of exempt facilities:*

The IMO has considered that, in order to promote transparency of information, the list of

exempt distribution-connected Scheduled Generators must be published on System Management's website. The IMO also considers that publication of the list will facilitate the IMO to conduct ongoing monitoring and compliance of generators with these clauses. The IMO has proposed additional amendments to the Amending Rules to reflect this consideration.

5.2. Additional Amendments to the proposed Amending Rules

Following the first public submission period the IMO has made some additional changes to the proposed Amending Rules to:

- reflect the suggestion received during the first submission period to consider a compliance regime;
- reflect the suggestion received during the first submission period to consider more succinct drafting of the Amending Rules;
- reflect the IMO's consideration of additional issues as outlined in section 5.1; and
- incorporate a number of minor and typographical amendments to improve the overall integrity of Market Rules.

The changes the IMO made to the Amending Rules presented in the Rule Change Proposal are outlined in detail in Appendix 1 of this Draft Rule Change Report.

5.3. Wholesale Market Objectives

The IMO considers that the Market Rules as a whole, if amended as presented in section 7, will not only be consistent with the Wholesale Market Objectives but also allow the Market Rules to better achieve Wholesale Market Objectives (a) and (d).

The IMO's assessment is presented below:

(a) to promote the economically efficient, safe and reliable production and supply of electricity and electricity related services in the South West Interconnected System:

The IMO considers that the proposed amendments will improve overall efficiency in the market while maintaining safety and reliability of the power system. The IMO considers that the proposed amendments will promote more efficient dispatch processes by removing unnecessary obligations on both Market Participants and System Management.

(d) to minimise the long-term cost of electricity supplied to customers from the South West interconnected system:

The IMO considers that the proposed amendments will reduce administrative costs for both Market Participants and System Management by removing the requirement to notify System Management when safe operating equipment and procedures are already installed to avoid erroneous connection.

5.4. Practicality and cost of implementation

5.4.1. Cost:

No costs associated with implementing the proposed changes have been identified.

5.4.2. Practicality:

The IMO has identified that the Power System Operation Procedure (PSOP): Dispatch will need to be updated as a result of this Rule Change Proposal. In particular, the PSOP should be amended to reflect the processes that:

- Market Participants should follow to apply for an exemption,
- System Management should follow to grant/revoke an exemption;
- Market Participants should follow to inform System Management if any faults occur in operating equipment and procedures; and
- System Management should follow to conduct ongoing monitoring of the exempt generator to ensure validity of the exemption.

The IMO does not consider that there are any other issues with the practicality of implementation of the proposed changes. No practicality of implementation issues were identified by submitting parties.

6. The IMO's Proposed Decision

The IMO's proposed decision is to accept the Rule Change Proposal as modified by the amendments outlined in section 5.2.

6.1. Reasons for the decision

The IMO made its proposed decision on the basis that the Amending Rules:

- better achieve Wholesale Market Objectives (a) and (d);
- are consistent with the remaining Wholesale Market Objectives;
- have the general support of the MAC; and
- have the support of submissions received during the first submission period.

7. Proposed Amending Rules

The IMO has made some amendments to the Amending Rules following the first submission period. These changes are as follows (~~deleted text~~, added text):

- 7.9.1. Subject to clauses 7.9.1A and 7.9.2, if a Market Participant intends to synchronise a Scheduled Generator, then unless it is exempt in accordance with clause 7.9.14, it must confirm with System Management the expected time of synchronisation:
- (a) at least one hour before the expected time of synchronisation; and
 - (b) must update this advice immediately if the time confirmed pursuant to clause 7.9.1(a) changes.
- 7.9.1A. Clause 7.9.1(a) does not apply where a Market Participant intends to synchronise a Scheduled Generator within an hour of desynchronisation, in which case it must:
...
- 7.9.5. Subject to clause 7.9.6A, if a Market Participant intends to desynchronise a Scheduled Generator, then unless it is exempt in accordance with clause 7.9.14, it must:
- (a) confirm with System Management the expected time of desynchronisation at least one hour before the expected time of desynchronisation; and
 - (b) update this advice immediately if the time confirmed pursuant to clause 7.9.5(a) changes.
- 7.9.13. If a Scheduled Generator connected to a distribution network has operating equipment and processes which enable it to synchronise and desynchronise only when it is safe to do so, then the Market Participant for that Scheduled Generator may apply to System Management for an exemption from the requirements in clauses 7.9.1 and 7.9.5.
- 7.9.14. Where System Management receives an application under clause 7.9.13 and is satisfied that the relevant Scheduled Generator has operating equipment and processes which enable it to synchronise and desynchronise only when it is safe to do so, System Management may exempt the Market Participant from the requirements in clauses 7.9.1 and 7.9.5 for that Scheduled Generator.
- 7.9.15. System Management must notify a Market Participant, in writing, of its decision under clause 7.9.14 to grant an exemption or not and provide written reasons for its decision.
- 7.9.16. A Market Participant that is exempt from the requirements in clauses 7.9.1 and 7.9.5 must notify System Management as soon as it becomes aware of any matter or thing which might prevent the Scheduled Generator that is the subject of the exemption from synchronising and desynchronising safely.
- 7.9.17. System Management may, at any time, by notice in writing, revoke an exemption granted by it under clause 7.9.14 if it is no longer satisfied that the Scheduled Generator for which the exemption was granted has operating equipment and processes which enable it to synchronise and desynchronise only when it is safe to do so. The notice must include:

(a) the decision of System Management to revoke the exemption and written reasons for its decision; and

(b) the date on which the exemption ceases to apply.

7.9.18. System Management must maintain, on its website, a list of Scheduled Generators for which the relevant Market Participant is exempt from the requirements in clauses 7.9.1 and 7.9.5.

7.9.19. System Management must document in the Power System Operation Procedure for Dispatch the processes to be used:

(a) for applications under clause 7.9.13;

(b) by System Management in determining whether or not to grant an exemption under clause 7.9.14;

(c) by System Management in determining whether or not to revoke an exemption under clause 7.9.17;

(d) for notification of any exemptions granted or revoked by System Management; and

(e) publishing and maintaining on System Management's website any information and details with respect to any exemptions.

Appendix 1. Further Amendments to the Proposed Amending Rules

The IMO has made some amendments to the Amending Rules following the first submission period. These changes are as follows (~~deleted text~~, added text):

- 7.9.1. Subject to clauses 7.9.1A and 7.9.2, ~~and 7.9.2A~~ if a Market Participant intends to synchronise a Scheduled Generator, then unless it is exempt in accordance with clause 7.9.14, it must confirm with System Management the expected time of synchronisation:
- (a) at least one hour before the expected time of synchronisation; and
 - (b) must update this advice immediately if the time confirmed pursuant to clause 7.9.1(a) changes.
- 7.9.1A. Clause 7.9.1(a) does not apply where a Market Participant intends to synchronise a Scheduled Generator within an hour of desynchronisation, in which case it must:÷
...
- ~~7.9.2A. System Management may advise in writing that a Market Participant that owns a Scheduled Generator connected to a distribution network is not required to confirm the expected time of synchronisation with System Management under clause 7.9.1, in respect of that Scheduled Generator, if System Management is satisfied that safe operating equipment and procedures are in place. If System Management is no longer satisfied that safe operating equipment and procedures are in place, then it must advise in writing that a Market Participant is required to confirm the expected time of synchronisation under clause 7.9.1 in respect of that Scheduled Generator.÷~~
- 7.9.5. Subject to clause 7.9.6A, if a Market Participant intends to desynchronise a Scheduled Generator, then unless it is exempt in accordance with clause 7.9.14, it must:
- (a) confirm with System Management the expected time of desynchronisation at least one hour before the expected time of desynchronisation; and
 - (b) update this advice immediately if the time confirmed pursuant to clause 7.9.5(a) changes.
- ~~7.9.6B. System Management may advise in writing that a Market Participant that owns a Scheduled Generator connected to a distribution network is not required to confirm the expected time of desynchronisation with System Management under clause 7.9.5, in respect of that Scheduled Generator, if System Management is satisfied that safe operating equipment and procedures are in place. If System Management is no longer satisfied that safe operating equipment and procedures are in place, then it must advise in writing that a Market Participant is required to confirm the expected time of desynchronisation under clause 7.9.5 in respect of that Scheduled Generator.÷~~
- 7.9.13. If a Scheduled Generator connected to a distribution network has operating equipment and processes which enable it to synchronise and desynchronise only when it is safe to do so, then the Market Participant for that Scheduled Generator may apply to System Management for an exemption from the requirements in clauses 7.9.1 and 7.9.5.

- 7.9.14. Where System Management receives an application under clause 7.9.13 and is satisfied that the relevant Scheduled Generator has operating equipment and processes which enable it to synchronise and desynchronise only when it is safe to do so, System Management may exempt the Market Participant from the requirements in clauses 7.9.1 and 7.9.5 for that Scheduled Generator.
- 7.9.15. System Management must notify a Market Participant, in writing, of its decision under clause 7.9.14 to grant an exemption or not and provide written reasons for its decision.
- 7.9.16. A Market Participant that is exempt from the requirements in clauses 7.9.1 and 7.9.5 must notify System Management as soon as it becomes aware of any matter or thing which might prevent the Scheduled Generator that is the subject of the exemption from synchronising and desynchronising safely.
- 7.9.17. System Management may, at any time, by notice in writing, revoke an exemption granted by it under clause 7.9.14 if it is no longer satisfied that the Scheduled Generator for which the exemption was granted has operating equipment and processes which enable it to synchronise and desynchronise only when it is safe to do so. The notice must include:
- (a) the decision of System Management to revoke the exemption and written reasons for its decision; and
 - (b) the date on which the exemption ceases to apply.
- 7.9.18. System Management must maintain, on its website, a list of Scheduled Generators for which the relevant Market Participant is exempt from the requirements in clauses 7.9.1 and 7.9.5.
- 7.9.19. System Management must document in the Power System Operation Procedure for Dispatch the processes to be used:
- (a) for applications under clause 7.9.13;
 - (b) by System Management in determining whether or not to grant an exemption under clause 7.9.14;
 - (c) by System Management in determining whether or not to revoke an exemption under clause 7.9.17;
 - (d) for notification of any exemptions granted or revoked by System Management; and
 - (e) publishing and maintaining on System Management's website any information and details with respect to any exemptions.