



Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2012_22 Commitment and De-commitment Notification Requirements

Submitted by

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Date submitted:	7 January 2013

Submission

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

Verve Energy supports System Management's Rule Change Proposal to remove a superfluous obligation from the Wholesale Electricity Market Rules (Market Rules). Specifically, Verve Energy considers it appropriate to create 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.

Verve Energy considers that System Management's obligations under the Market Rules are significant and the removal of unnecessary activities is a practical and prudent course of action.

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

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	Verve Energy considers that the proposal allows for a more efficient management of the



Wholesale Market Objective	Comments
of electricity and electricity related services in the South West interconnected system.	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.
