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## Wholesale Electricity Market Rule Change Proposal Submission Form

### RC\_2013\_05 LoadWatch, EOI and RDQ Provision

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#### Submitted by

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#### Submission

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

#### Background

System Management currently provides the Independent Market Operator (IMO) with numerous data points to assist the IMO in operating the Wholesale Electricity Market (WEM). Most of the data requirements on System Management are set out in various clauses of the Market Rules as specific obligations for System Management to provide information to the IMO.

Some of the data points that System Management currently provides to the IMO are used by the IMO to produce the LoadWatch bulletin during the summer months. Other data points currently provided by System Management, relating to information on Relevant Dispatch Quantity (RDQ) and End of Interval (EOI) data are used by the IMO in Balancing Price calculations as well as in calculations concerning the starting point for a Facility ramp rate, impacting on the pricing in the Balancing Merit Order (BMO).

The IMS Interface Procedure, which is a Market Procedure, sets out obligations on System Management to provide the data described above to the IMO.

## Issues

The IMO has identified that the Market Rules do not contain any explicit obligations on System Management to provide the IMO with the information described in the section above. The Market Rules do not prohibit System Management from providing the information, but at the same time do not contain an explicit obligation on System Management to provide the information.

The Market Rules and the Market Procedures are therefore not perfectly aligned with regard to these data provision obligations on System Management.

## Change Proposal

The IMO submitted Rule Change Proposal 2013 05 “LoadWatch, EOI and RDQ Provision” on 9 April 2013.

The IMO proposed to amend the Market Rules to place a specific obligation on System Management to provide the IMO with the necessary data to produce LoadWatch as well as RDQ and EOI data. This would ensure the Market Procedures and the Market Rules are aligned in relation to this obligation on System Management.

## Perth Energy’s Views

Perth Energy supports the proposed changes to the Market Rules.

Perth Energy considers the proposed changes to be of a minor nature and could be classified as “housekeeping” type of changes. The proposed amendments will not bring about any changes to current practices and will merely ensure that the Market Rules also reflect current practice and the obligations that are set out in the Market Procedure entitled “IMS Interface Procedure”.

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

Perth Energy considers the proposed amendments will provide further clarity in relation to System Management’s obligations to provide data to the IMO to support the production of LoadWatch and to support the IMO’s calculations and work related to the Balancing Market. Perth Energy therefore considers the proposed changes would impact positively on the achievement of Market Objective<sup>1</sup>(a) relating to economic efficiency.

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<sup>1</sup> The objectives of the market are:

- (a) to promote the economically efficient, safe and reliable production and supply of electricity and electricity related services in the South West interconnected system;
- (b) to encourage competition among generators and retailers in the South West interconnected system, including by facilitating efficient entry of new competitors;
- (c) to avoid discrimination in that market against particular energy options and technologies, including sustainable energy options and technologies such as those that make use of renewable resources or that reduce overall greenhouse gas emissions;
- (d) to minimise the long-term cost of electricity supplied to customers from the South West interconnected system; and

Perth Energy has not identified any impacts on the remaining Market Objective.

- 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.**

Perth Energy has not identified any impacts to our business.

- 4. Please indicate the time required for your organisation to implement the change, should it be accepted as proposed.**

Perth Energy will not require any lead time to implement the proposed changes.

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(e) to encourage the taking of measures to manage the amount of electricity used and when it is used.