
Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2013_07 Correction of Minor and Typographical Errors

Submitted by

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Submission

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

Background

The Independent Market Operator (IMO) has reviewed the Market Rules that apply in the Wholesale Electricity Market (WEM) and identified a range of typographical and other minor errors in numerous clauses. Errors identified include, but are not limited to:

- There are some remaining references to the “Electricity Generation Corporation” instead of to “Verve Energy”,
- There is one mention (in clause 2.2.2) of the “Wholesale Energy Market”. This term does not exist elsewhere in the Market Rules and the reference should be to the “Wholesale Electricity Market”,
- Clause 7.10.1 requires Market Participants to comply with Dispatch Instructions, subject to clause 7.10.2. Clause 7.10.2 lists several instances where Market Participants do not need to comply with clause 7.10.1. However, clause 7.10.2 fails to mention the situation of having a real time Forced Outage or Consequential

Outage. Clause 2.13.6B expressly exempts System Management from reporting a breach of clause 7.10.1 if the breach is due to a logged Forced Outage.

- There are some grammatical errors, e.g. referring to “of” instead of “on”,
- There are some terms that have been capitalised without the term being a defined term in the Market Rules, e.g. “bilateral trade declaration”. There is also one defined term that has not been capitalised, being “Suspension Event”, and
- There are numerous inconsistencies in cross-referencing other clauses or sub-clauses. For example, clause 2.29.4(d) currently makes a cross reference to 2.29.4(a) simply by referring to “(a)”. This is inconsistent with the cross referencing convention elsewhere in the Market Rules where the full clause numbering is used.

A complete list of all the identified errors is available in the IMO’s Rule Change Proposal.

Change Proposal

The IMO submitted Rule Change Proposal 2013 07 “Correction of Minor and Typographical Errors” on 10 September 2013.

The IMO proposed to correct the errors identified by removing capitalisation of non-defined terms, introducing consistent clause cross-referencing, replacing references to the “Electricity Generation Corporation” with “Verve Energy” and “Wholesale Energy Market” with “Wholesale Electricity Market” and correcting typographical and grammatical errors.

In relation to the issue identified with clause 7.10.2, the IMO has proposed to add having provided a valid notification of a Forced Outage or Consequential Outage to the list of items in clause 7.10.2 that will excuse a Market Participant from complying with a Dispatch Instruction under clause 7.10.1. The IMO has also proposed to remove clause 2.13.6B as it becomes redundant.

The IMO submitted the Rule Change Proposal to the Fast Track process as it considered the proposed changes to be minor and of a procedural nature and therefore consistent with the criteria for using the Fast Track process (clause 2.5.9).

Perth Energy’s Views

Perth Energy supports the IMO’s proposed amendments of the Market Rules.

Perth Energy considers that the proposed amendments would marginally improve the consistency of the Market Rules and remove some obvious, minor errors.

Perth Energy also agrees with the IMO’s assessment that the proposed changes are minor and that the Rule Change Proposal therefore can be progressed using the Fast Track process.

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

Perth Energy considers that the proposed amendments to the Market Rules would marginally improve the transparency of the Market Rules. This is likely to have a marginal positive impact on the ability to achieve Market Objective¹ (a) relating to economic efficiency.

Perth Energy has not identified any impacts on the other 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.

Perth Energy has not identified any impacts on our IT or other business systems.

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.

¹ 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
- (e) to encourage the taking of measures to manage the amount of electricity used and when it is used.