



INDEPENDENT
MARKET
OPERATOR

Wholesale Electricity Market Submission to Rule Change Proposal

RC_2013_08

Market Participant Fee – Clarification of GST Treatment

Submitted by

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Date submitted:	3 July 2013

Submission

Submissions for Rule Changes should be submitted to:

Independent Market Operator

Attn: Group Manager, Market Development

PO Box 7096

Cloisters Square, Perth, WA 6850

Fax: (08) 9254 4399

Email: market.development@imowa.com.au

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

System Management supports the IMO's amendments to MR 2.25 which clarify its role as an agent for the collection of these System Operator fees and its ability to issue valid invoices to Market Participants directly for System Management.

System Management can also advise that Western Power has applied for, and received, its own Private Ruling confirming that services performed by System Management for the WEM are GST exempt.



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

System Management considers the proposed amendments will better address the Wholesale Electricity Market ('WEM') Objectives (a) and (d) in that they seek to avoid substantial costs that would otherwise be incurred by System Management to establish its own invoicing processes and systems.

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.

System Management does not envisage any system or process change costs will be incurred as a result of this rule change proposal.

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

n/a
