

Wholesale Electricity Market Rule Change Proposal Submission

RC_2013_15

Outage Planning Phase 2 – Outage Process Refinements

Submitted by

Name:	Margaret Pyrchla
Phone:	(08) 9326 4535
Email:	margaret.pyrchla@westernpower.com.au
Organisation:	Western Power
Address:	363 Wellington Street, Perth WA 6000
Date submitted:	28 June 2019

Submissions on Rule Change Proposals can be sent by:

Email to: support@rcpwa.com.au

Post to: Rule Change Panel
Attn: Executive Officer
C/o Economic Regulation Authority
PO Box 8469
PERTH BC WA 6849

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

Western Power is supportive of the proposed changes to the Wholesale Electricity Market (WEM) Rules which seek to limit the scheduling of outages to only components of the transmission system that have the potential to affect power system security and reliability. The proposed changes will remove the inefficiency of requiring System Management to schedule outages for components of the transmission system that do not have the potential to affect power system security and reliability.

Western Power agrees with the Rule Change Panel's decision to not include distribution system equipment in the equipment list under clause 3.18.2(c)(i) of the WEM Rules, unless the equipment is included on the list by System Management under the proposed clause 3.18.2(c)(vi) of the WEM Rules. As noted on page 44 of the Draft Rule Change Report, Western Power has suggested an alternative approach for monitoring the impact that proposed outages on the distribution network has on distribution-connected generators embedded within the distribution network. This alternative approach requires Western Power to notify AEMO of situations when a distribution-connected generator may be impacted by a distribution outage and allows AEMO to notify Western Power if that distribution-connected generator's capacity is needed to maintain power system security and reliability. This approach will address the concern highlighted in the Rule Change Proposal in an efficient and pragmatic manner, and can be implemented as part of Western Power's business-as-usual activities.

However, due to the increasing number of distribution-connected generators, Western Power is of the view that the treatment of distribution-connected generators in the WEM should be reviewed holistically as part of the WEM Reform Program.

Western Power is also supportive of the proposed enhancements to the Opportunistic Maintenance process in the Rule Change Proposal.

Western Power notes that its views on the Rule Change Proposal are limited to the above matters. Western Power makes no comments on the other matters raised in the Rule Change Proposal.

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

Western Power considers that the proposed rule changes regarding the equipment list and enhancements to the Opportunistic Maintenance process would better facilitate the achievement of the 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.

Western Power will need to make changes to its IT systems and internal outage process to implement the suggested alternative approach for distribution-connected generators. These internal changes can be undertaken as part of Western Power's business-as-usual activities.

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

Western Power is currently in the process of implementing the above changes and will be able to meet the Rule Change expected commencement date of 1 February 2020.
