



INDEPENDENT
MARKET
OPERATOR

Wholesale Electricity Market Second Submission to Rule Change Proposal

RC_2013_17

Correction of estimated output of Intermittent Generation for purposes of Appendix 9

Submitted by

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Date submitted:	25 March 2014

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

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

System Management continues to support the proposed rule change and thanks the IMO for clarifying some of the issues raised in our first submission.

System Management still requires some clarity in relation to the processes that are followed for participants to request a revised estimate for the purposes of Certification



System Management suggests the following changes and additions to the proposal :

Some revisions will be required to the PSOP dispatch to describe how System Management will revise an estimate, however System Management still believes that the heads of power to initially request a revision belongs within the Market Rules. i.e

MR[xxxx]. A Market Participant or the IMO may seek a revision to an estimate provided in respect of a particular Non-Scheduled generation Facility, where a participant or the IMO believes the existing estimate may not reflect the facilities relevant demand for an interval.

Placing the provision within the rules makes it clear that a revision can be requested. System Management does not believe that a PSOP is an appropriate place for this provision.

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 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.

System Management will use the existing processes to provide revised estimate information to the IMO as described in the PSOP – Dispatch and IMS Market Procedure.

System Management will also propose in the PSOP - Dispatch that Participants and the IMO will be restricted to one request for a revision of a Non-scheduled generation forecast for the relevant interval(s).

System Management will need to develop an internal process for recording and progressing revised estimate requests.

Provided these proposed PSOP suggestions are accepted there will be minimal organisational impacts on System Management. Draft changes have been commenced by System Management in consultation with the IMO however these changes will not be completed until after the IMO has finalised the requirements of this rule change. There may be some minor costs associated with the retrieval of some data depending on data archiving arrangements within Western Power.

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

Assuming that the existing processes for determination of estimated values and communication to the IMO are used for the revised estimates, System Management's only significant change will be the



development of an internal process for accommodating revision requests. It is estimated that this process can be implemented by 1 October 2014.
