

Wholesale Electricity Market Submission to Rule Change Proposal

RC_2014_03 Administrative improvements to the Outage Process

Submitted by

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Submission

Submissions for Rule Changes should be submitted to:

Independent Market Operator

Attn: Group Manager, Development and Capacity

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Cloisters Square, Perth, WA 6850

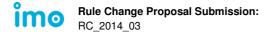
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1. Please provide your views on the proposal, including any objections or suggested revisions.

Amendments to the Consequential Outage process

Perth Energy strongly supports this proposed change. System Management has all of the required information to check that any claim for a consequential outage is valid and it is unnecessary for the current approach to be retained. The current method is time consuming, costly in terms of administrative effort and potentially disadvantageous to a generator. For example, Merredin Energy experienced a consequential outage at Christmas due to a



scheduled Western Power outage over-running. Because of holidays, and the fact that key Merredin Energy staff are based in the Eastern States, it proved to be very difficult to get hold of a person who could sign off as the "Authorised Person" within the nominated timeframe.

Logging an outage in advance

Perth Energy considers that this would be an improvement to the current system. There have been a number of occasions where Western Power has asked that plant be kept off-line while transmission system maintenance is being done and it would be quite sensible for this to be logged in advance as a consequential outage in the same way that scheduled outages are logged in advance. This then provides System Management with information in advance to allow it to plan around the outage.

The other proposed changes generally reflect actual practice or make changes that Perth Energy considers to be improvements.

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

The proposed changes will reduce the administrative burden across Market Participants which will improve the overall efficiency of market operations.

The changes should also improve the level of information being provided to System Management and assist in planning of dispatch.

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.

Reduced administration costs.

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

These changes can be implemented immediately.