



Call for Further Submissions:  
Omnibus Rule Change (RC\_2014\_07)  
Standard Rule Change Process

12 October 2018

## 1. Background

On 22 December 2014, the Independent Market Operator (**IMO**) submitted a Rule Change Proposal titled “Omnibus Rule Change” (RC\_2014\_07). The Rule Change Proposal sought to correct a number of minor, administrative and typographical errors identified in the Wholesale Electricity Market Rules (**Market Rules**). The Rule Change Proposal also identified a number of activities that may be impractical to undertake in the manner required by the then Market Rules, and proposed amendments to reflect practices prevalent at the time.

The first submission period was held between 22 December 2014 and 13 February 2015. Submissions were received from Community Electricity and Perth Energy. Both submissions were supportive of the Rule Change Proposal. However, Perth Energy raised three issues with the proposed changes. A copy of all submissions received during the first submission period are available at: [https://www.erawa.com.au/rule-change-panel/market-rule-changes/rule-change-rc\\_2014\\_07](https://www.erawa.com.au/rule-change-panel/market-rule-changes/rule-change-rc_2014_07).

The Draft Rule Change Report was published by the IMO on 16 March 2015.

The second submission period was held between 16 March 2015 and 15 April 2015. No submissions were received.

The IMO delayed its final decision on RC\_2014\_07 as uncertainties associated with the Minister’s Electricity Market Review arose. In May 2015, the Minister asked the IMO to exercise its discretion under then clause 2.5.10 of the Market Rules to extend the normal timeframes for processing all Rule Change Proposals in progress (except for those relating to the deferral of Reserve Capacity Cycles) until the new rule change approval body was established as part of the Electricity Market Review reforms.

The rule making functions of the IMO were transferred to the Rule Change Panel on 26 November 2016, and the Rule Change Panel commenced its rule making functions on 3 April 2017.

On 10 April 2017 the Rule Change Panel extended the timeframe for publication of the Final Rule Change Report until 29 December 2017 to give it sufficient time to assess the Draft Rule Change Report against the recent changes to the Market Rules and the Government’s further reform announcements.

On 21 December 2017 the Rule Change Panel further extended the timeframe for the publication of the Final Rule Change Report to 31 December 2018 to allow for additional consultation on the Rule Change Proposal, including this call for further submissions, as the Market Rules had changed significantly since the time of the publication of the Draft Rule Change Report.

The Rule Change Panel and AEMO have assessed the changes proposed in RC\_2014\_07 against the changes to the Market Rules that have been made since RC\_2014\_07 was submitted. The Rule Change Panel considers that the majority of changes proposed in RC\_2014\_07, once amended to reflect the current Market Rules,<sup>1</sup> are still valid to be considered via the rule change process. However, the Rule Change Panel proposes to reject

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<sup>1</sup> Such as the transfer of the majority of functions from the IMO to AEMO and the transfer of System Management functions to AEMO.

several of the proposed changes and to make several changes to the proposed Amending Rules.

## 2. Call for Further Submissions

The Rule Change Panel seeks further submissions on the Draft Rule Change Proposal and the further amendments proposed in this call for further submissions on the basis that:

- a significant period of time has passed since the IMO released the Draft Rule Change Report, during which time the Market Rules have undergone numerous changes; and
- the Rule Change Panel is proposing further amendments to the Amending Rules published in the Draft Rule Change Report that have not been consulted on.

The Rule Change Panel invites interested stakeholders to make submissions on this call for further submissions. The further submission period is 20 Business Days from the publication of this notice. Submissions must be delivered to the Rule Change Panel by **5:00 pm on Friday, 9 November 2018**.

The Rule Change Panel prefers to receive submissions by email, using the submission form available at <https://www.erawa.com.au/rule-change-panel/make-a-rule-change-submission> sent to [rnp.secretariat@rcpwa.com.au](mailto:rnp.secretariat@rcpwa.com.au).

Submissions may also be sent to the Rule Change Panel by post, addressed to:

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

## 3. Overview of Proposed Changes in the Draft Rule Change Report

Rule Change Proposal RC\_2014\_07 sought to:

- correct a number of minor and typographical errors identified in the Market Rules;
- make minor administrative changes; and
- make several amendments to address activities that the IMO had identified as impractical.

The IMO noted that none of the proposed amendments were seeking to change the operation or the intended meaning of the Market Rules.

Full details relating to the Rule Change Proposal are available on the Rule Change Panel's website at [Rule Change RC\\_2014\\_07 - Omnibus Rule Change](#).

## 4. Assessment against Changes to the Market Rules

The Rule Change Panel and AEMO have assessed the changes proposed in RC\_2014\_07 against the changes that have been made to the Market Rules since the Draft Rule Change Report was published in March 2015. The Rule Change Panel considers that the majority of changes proposed in RC\_2014\_07 are still valid to be considered via the rule change process.

The changes made to the Market Rules since the publication of the Draft Rule Change Report affect the proposal as follows (these changes are identified via comment boxes in the provided drafting):

- the proposed changes for multiple clauses were amended to reflect:
  - the transfer of functions from the IMO to AEMO; and
  - the transfer of System Management functions to AEMO;
  - the transfer of some functions of the IMO to the Economic Regulation Authority (ERA);
- clauses 2.13.21, 2.23.1, 2.23.4, 2.23.9 and 4.27.1 are now blank thus the proposed changes cannot be incorporated;
- clause 2.34.14 did not originally include the term 'Extra Consumption Decrease Prices' as it did not exist during the Rule Change Proposal. The Rule Change Panel has amended the proposed drafting to account for the Extra Consumption Decrease Price to achieve the intent of the proposal with the current Market Rules; and
- clause 4.27.2 has changed significantly from the time of the Draft Rule Change Report as part of the transfer of functions from IMO to AEMO, and thus the changes are no longer applicable.

## 5. Additional Changes Proposed by the Rule Change Panel

The Rule Change Panel proposes the following additional changes to the proposed Amending Rules (these changes are also identified via comment boxes in the provided proposed Amending Rules in section 8 of this call for further submissions):

- amending clause 2.34.14 to:
  - apply only to revised Standing Data whilst removing all items that are not Standing Data as defined in Appendix 1 of the Market Rules.<sup>2</sup> Removing these items from clause 2.34.14(a) also removes inconsistencies in the timelines for Standing STEM Submissions, Standing Bilateral Submissions and Standing Resource Plan Submissions;<sup>3</sup> and
  - provide certainty on the time from which AEMO must use revised Consumption Increase Prices, Consumption Decrease Prices and Extra Consumption Decrease Prices;
- rejecting the proposed changes to clause 3.2.5 that change System Management's obligation from respecting certain aspects when establishing or modifying the Technical Envelop to taking these aspects into account. The Rule Change Panel does not consider that this is a minor change and therefore not within the scope of this Rule Change Proposal as the phrasing of 'taking into account' is a weaker obligation than 'respecting';
- rejecting the insertion of the reference to re-synchronisation when referring to section 3.21B in clause 3.21B.8, as section 3.21B pertains to the permission to decommit a Scheduled Generator;

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<sup>2</sup> For example, Standing Resource Plan Submissions are not Standing Data as defined in Appendix 1 of the Market Rules, but are included in clause 2.34.14(a) which specifies when revised Standing Data can be used.

<sup>3</sup> The timelines for Standing STEM Submissions, Standing Bilateral Submissions and Standing Resource Plan Submissions are laid out in in clauses 6.3C.1, 6.2A.1 and 6.5C.1A respectively.

- amend clause 3.21B.8 to enhance readability (by changing the word ‘is’ to ‘in’);
- rejecting the proposed deletion of the word ‘Study’ from the term ‘Long Term PASA Study Horizon’ in clause 4.5.1, as ‘Long Term PASA Study Horizon’ is a defined term;
- rejecting the proposed amendments to clauses 2.30A.6, 2.31.23 and 9.2.1 which change the way certain Market Procedures are referenced in the Market Rules. The approach on how to refer to Market Procedures in the Market Rules in general is currently being assessed as part of RC\_2015\_01. The Rule Change Panel therefore proposes to reject these changes in RC\_2014\_07 to avoid conflicts between the two Rule Change Proposals and allow for a more holistic assessment of the issue via RC\_2015\_01;
- reject the change to clause 4.27.2 as it is no longer applicable. The original intention was to move the obligation that required the IMO to monitor total available capacity on the SWIS from clause 4.27.1 to clause 4.27.2. Since then, given the transfer of functions from IMO to AEMO, clause 4.27.2 was changed significantly to now require AEMO to assess Equivalent Planned Outage Hours.<sup>4</sup> Thus, it is no longer practical to give effect to the proposed amendments given the vast departure from the original subject matter;
- reject the changes to clause 4.29.3 as the clause has evolved such that the changes can no longer be applied;
- rejecting the proposed amendments to clause 7.13.1(cB) as System Management is now a part of AEMO, thus making the amendment redundant (this was confirmed with AEMO);
- amending the proposed changes to clause 9.20.1 to change the way the relevant Market Procedure is referenced while keeping the intention of the original change. It was originally proposed that the method of how a Notice of Disagreement should be submitted to AEMO should be defined in the Market Procedure and not in the Market Rules;
- removing the defined term ‘Shareholding Minister’ from the Glossary as it is not used in the Market Rules;
- further amend the definition of the new defined term ‘Technical Rules’ in the Glossary (which is proposed to replace the defined term ‘Technical Code’) to reflect the definition in the Access Code;
- replacing the word ‘clause’ with ‘section’ in Appendix 1(b)i, (e)i, g(ii) and (i)ii to align with the standard drafting conventions within the Market Rules; and
- rejecting the proposed amendments to Appendix 5, Step 9 of the Market Rules as the proposed changes have already been addressed in RC\_2017\_06, with those relevant Amending Rules commencing in June 2019. As this is only a typographical error, the Rule Change Panel considers that it is sufficient to correct the error at that time.

A comparison between the proposed rule changes and the Rule Change Panel’s revised changes is presented in Appendix A.

## 6. Protected Provisions and Civil Penalty Provisions

The proposed changes to clauses in section 2.12 and clauses 2.13.15, 2.13.16, 2.13.21, 2.16.9FA, 2.22.8B, 2.23.1, 2.23.4, 2.23.9 and 2.24.6 of the Market Rules are Protected

<sup>4</sup> Detailed in Part 3 of the Wholesale Electricity Market Amending Rules 2016, which commenced on 1 October 2017.

Provisions under clause 2.8.13 of the Market Rules. Thus, under clause 2.8.3 of the Market Rules, the Amending Rules in this call for further submissions will require Ministerial approval.

The Rule Change Panel notes that clauses 3.16.4 and 9.3.2 of the Market Rules, which are being amended, are Category B civil penalty provisions under the *Electricity Industry (Wholesale Electricity Market) Regulations 2004 (WEM Regulations)*. The Rule Change Panel considers that the proposed amendments should remain civil penalty provisions as the amendments do not affect their suitability to remain so. The Public Utilities Office will be made aware of these amendments accordingly.

The proposed amendments in this Rule Change Proposal do not affect any clauses that are Reviewable Decisions.

## 7. Practicality and Cost of Implementation

In the Draft Rule Change Proposal, the IMO advised that it would incur minor costs for the development and progression of RC\_2014\_07 and the associated Procedure Change Proposals.

The Rule Change Panel has confirmed with AEMO that the costs for implementing the proposed amendments will not be significant and that no amendments will be required to AEMO's systems.

Additionally, the Draft Rule Change Report for RC\_2014\_07 noted that the Market Procedure: Reserve Capacity Performance Monitoring would also require updating. Now that proposed amendments to clause 4.27.2 have been rejected as they are no longer applicable, the associated Market Procedure no longer needs to be amended.

## 8. Proposed Amending Rules

To assist stakeholders in preparing their submissions, RCP Support has prepared the following revision to the proposed Amending Rules to reflect the changes of the Market Rules since the publication of the Rule Change Proposal and the Draft Rule Change Report.

The Rule Change Panel has provided clarifications of changes from the drafting in the Draft Rule Change Report in comment boxes before the affected clauses.

The revised proposed Amending Rules are presented below in their entirety, marked up against the Market Rules as at 1 September 2018 (~~deleted text~~, added text):

...

~~2.12.1. [Blank]~~

~~2.12.2. [Blank]~~

~~2.12.3. [Blank]~~

~~2.12.4. [Blank]~~

~~2.12.5. [Blank]~~

...

Clauses 2.13.15 and 2.13.16, where the 'Economic Regulation Authority' appears, this was originally referenced as 'the IMO'.

2.13.15. Where the alleged breach relates to a Category A Market Rule (as determined in accordance with the WEM Regulations) and the Economic Regulation Authority is not the Rule Participant that is alleged to have breached the Market Rules, the Economic Regulation Authority must ~~determine~~make a decision as to whether a breach has occurred.

2.13.16. The Economic Regulation Authority may:

- (a) ~~determine that decide~~a breach has taken place, in which case the Economic Regulation Authority may issue a penalty notice in accordance with the WEM Regulations; or

...

...

Clause 2.13.21 is now blank (thus the proposed changes are no longer applicable).

2.13.21. [Blank]

...

Clause 2.16.9FA has changed since the Draft Rule Change Report, but the proposed changes are still applicable.

2.16.9FA. Subject to clause 2.16.9FB, the Economic Regulation Authority may extend the timeframe for an investigation under clause 2.16.9E for a period of up to six months, to the nearest Business Day following that six month extension period. Where the Economic Regulatory Regulation Authority makes such an extension it must publish a notice of the extension on the Market Web Site. The Economic Regulation Authority may extend the timeframe for an investigation more than once.

...

Clause 2.22.8B was originally proposed to be amended, but the clause was deleted due to the dissolution of the IMO, so the proposed change is no longer applicable.

...

Clauses 2.23.1, 2.23.4 and 2.23.9 are now blank, so these amendments are no longer applicable.

2.23.1. [Blank]

...

2.23.4. [Blank]

...

2.23.9. [Blank]

...

The clause 2.24.6 amendment was to change the word 'Regulatory' to 'Regulation'. This has already been corrected, so the proposed change is no longer applicable.

2.24.6. By the date which is five Business Days prior to 30 June each year, the Economic Regulation Authority must notify AEMO of—

- (a) the dollar amount that the Economic Regulation Authority may recover under clause 2.24.5; and
- (b) the dollar amount that the Economic Regulation Authority may recover under clause 2.24.5B (to the extent such amount is not already included in the dollar amount referred to in clause 2.24.6(a)).

...

The amendments to clause 2.30A.6 (apart from the typographical insertion of the full stop after the clause number) are proposed to be rejected, as the way Market Procedures are referred to in the Market Rules will be considered by RC\_2015\_01.

Where 'AEMO' appears in clause 2.30A.6, this was originally referenced as 'the IMO'.

2.30A.6. AEMO must document the Spinning Reserve costs exemption process in the Registration Procedure, and:

- (a) applicants for exemption from Spinning Reserve costs must follow that documented Market Procedure; and
- (b) AEMO must follow that documented Market Procedure when processing applications for exemption from Spinning Reserve cost funding.

...

The amendments to clause 2.31.23 (apart from the removal of the extra space in front of 'transfer') are proposed to be rejected, as the way Market Procedures are referred to in the Market Rules will be considered by RC\_2015\_01.

Where 'AEMO' appears in clause 2.31.23, this was originally referenced as 'the IMO'.

2.31.23. AEMO must document the registration, de-registration and -transfer process in the Registration Procedure, and:

...

...

Where 'AEMO' appears in clause 2.33.2, this was originally referenced as 'the IMO'.

2.33.2. AEMO must prescribe a Rule Participant de-registration form that requires an applicant for de-registration as a Rule Participant to provide the following:

...



Where 'AEMO' appears in clause 2.33.5, this was originally referenced as 'the IMO'.

2.33.5. ~~AEMO must prescribe a~~The Facility transfer form ~~prescribed by AEMO must that~~ requires ~~that~~ an applicant for transfer of a Facility ~~to~~ provide the following:

...

- (f) evidence to ~~the satisfaction of AEMO's~~ satisfaction that the party making the application has assumed the Reserve Capacity Obligations associated with the Facility, and agrees to any Short Term Special Price Arrangements associated with the Facility;

...

...

The Rule Change Panel proposes to amend clause 2.34.14(a) to remove all items that are not Standing Data as per Appendix 1 of the Market Rules. The timelines for these items are set out in other clauses of the Market Rules, in particular:

- the timeline for Standing STEM Submissions is defined in clause 6.3C.1;
- the timeline for Standing Bilateral Submissions is defined in clause 6.2A.1; and
- the timeline for Standing Resource Plan Submissions is defined in clause 6.5C.1A.

This removes the contradicting timelines that currently exist for these items and addresses the issue that these items are erroneously referred to as Standing Data. However, revised Standing Data for clause 6.6.9 applications must remain in clause 2.34.14(a) as clause 6.6.11(b) specifically references clause 2.34 for commencement times.

The Consumption Increase Prices, Consumption Decrease Prices and Extra Consumption Decrease Prices are removed and placed into clause 2.34.14(b) as per the intention of this Rule Change Proposal.

The Rule Change Panel notes that the proposed changes to clause 2.34.14 overlaps with the changes proposed in RC\_2014\_06 (Removal of Resource Plans and Dispatchable Loads). Under the current timelines, the RC\_2014\_06 Final Rule Change Report will be published prior to the RC\_2014\_07 Final Rule Change Report and thus the Rule Change Panel will:

- take into account any changes made to this clause by RC\_2014\_06 when writing the Final Rule Change Report for RC\_2014\_07; and
- commence any changes made to clause 2.34.14 immediately after the commencement of RC\_2014\_06 (if applicable).

At the time of the Draft Rule Change Report, the intention was to move the contents of clause 2.34.14(a)ii to clause 2.34.14(b). 'Extra Consumption Decrease Prices' did not exist at the time of the Draft Rule Change Report, but this concept is related to 'Consumption Increase Prices' and 'Consumption Decrease Prices', so the Rule Change Panel seeks to honour the original intention and has also moved the term 'Extra Consumption Decrease Prices' into clause 2.34.14(b).

The Rule Change Panel also proposes to amend the changes to clarify the time from which AEMO must use the revised Consumption Increase Prices, Consumption Decrease Prices and Extra Consumption Decrease Prices.

Where 'AEMO' appears in clause 2.34.14, this was originally referenced as 'the IMO'.

2.34.14. AEMO must commence using revised Standing Data ~~from:~~

- (a) ~~8:00 AM on the Scheduling Day following AEMO's acceptance of the revised Standing Data in the case of:~~
- ~~i. Standing STEM Submissions;~~
  - ~~iA. Standing Bilateral Submissions;~~
  - ~~iB. Standing Resource Plan Submissions;~~
  - ~~ii. Consumption Increase Prices, Consumption Decrease Prices and Extra Consumption Decrease Prices; and~~
  - ~~iii. Standing Data changes stemming from acceptance of an application under clause 6.6.9,~~
- ~~with the exception that the previous Standing Data remains current for the purpose of settling the Trading Day that commences at the same time as that Scheduling Day; and~~
- from 8:00 AM on the Schedule Day following AEMO's acceptance of revised Standing Data resulting from an application under clause 6.6.9, with the exception that the previous Standing Data remains current for the purpose of settling the Trading Day that commences on the Scheduling Day following AEMO's acceptance of the revised Standing Data;
- (b) from 8:00 AM on the latter of:
- i. the date proposed by the Rule Participant; or
  - ii. the date two days following the end of the Trading Day on which AEMO accepted the revised Standing Data,
- for Consumption Increase Prices, Consumption Decrease Prices and Extra Consumption Decrease Prices; and
- (c) as soon as practicable in the case of any other revised Standing Data.

...

Where 'AEMO' appears in clause 2.38.4, this was originally referenced as 'the IMO'.

2.38.4. The Credit Support for a Market Participant must be:

- (a) an obligation in writing that:
- ...
- iv. constitutes valid and binding unsubordinated obligations ~~to~~of the Credit Support provider to pay to AEMO amounts in accordance with its terms which relate to the relevant Market Participant's obligations under the Market Rules; and

...

...

Amendments to clause 3.2.5 to remove the term 'respect' were intended to clarify the wording of clause 3.2.5. The Rule Change Panel's view is that the proposed amendments significantly change the meaning of the clause and thus proposes to reject the changes. In clause 3.2.5(e), it is proposed to change the defined term 'Technical Code' to 'Technical Rules' to be consistent with the Access Code.

- 3.2.5. The Technical Envelope represents the limits within which the SWIS can be operated in each SWIS Operating State.- In establishing and modifying the Technical Envelope under clause 3.2.6, System Management must:
- (a) respect all Equipment Limits but only to the extent those limits are not inconsistent with the dispatch of Facilities that, but for the Equipment Limits, would be dispatched under clause 7.6.1C;
  - (b) respect all Security Limits;
  - (c) respect all SWIS Operating Standards;
  - (d) respect all Ancillary Service standards specified in clause 3.10; and
  - (e) take into account those parts of the SWIS which are not designed to be operated to the planning criteria in the relevant Technical RulesCode.

...

Clauses 3.5.1 and 3.5.1(eA) already incorporate amendments made by other rule changes, but the following corrections are still endorsed.

- 3.5.1. The SWIS is in an Emergency Operating State when System Management considers that any of the following circumstances exist, or are likely to exist within the next ~~fifteen~~15 minutes, or are likely to exist after ~~fifteen~~15 minutes; and actions other than those allowed under the Normal Operating State or High Risk Operating State must be implemented immediately by System Management so as to moderate or avoid the circumstance:

...

- (eA) operation under a Normal Operating State or a High Risk Operating State would pose a significant risk to the physical safety of the public or field personneal;

...

...

- 3.11.8A. System Management may enter into an Ancillary Service Contract with a Rule Participant for the provision of a Load Rejection Reserve Service, System Restart Service or Dispatch Support Service.

...

3.16.4. Unless otherwise directed by System Management, Rule Participants must provide the following data to System Management in respect of each week in the ~~m~~Medium ~~t~~Term ~~p~~Planning horizon described in clause 3.16.2 by the time specified in the Power System Operation Procedure:

...

...

Clause 3.16.1 requires System Management to carry out a Medium Term PASA by the 15<sup>th</sup> of each month and clause 3.16.9 prescribes publication of the Medium Term PASA. An amendment is sought to clause 3.16.9 to allow the Medium Term PASA to be published on the first Business Day falling on or after the 15<sup>th</sup> of the month.

In the first submission period for RC\_2014\_07, Perth Energy questioned whether there was a practical need for the proposed amendment.

The Rule Change Panel agrees with the view expressed by the IMO in the RC\_2014\_07 Draft Rule Change Report that there is no need to publish the Medium Term PASA during or before a weekend, if the 15<sup>th</sup> of the month falls on a non-Business Day.

Due to the transfer of System Management functions to AEMO, part of the originally proposed changes are no longer applicable.

3.16.9. ~~By~~ On the first Business Day falling on or following the 15th day of each month, System Management must publish the following information developed as a result of ~~its~~ System Management's Medium Term PASA ~~study~~ for each week in the ~~m~~Medium ~~t~~Term ~~p~~Planning horizon described in clause 3.16.2:

...

...

In clause 3.21B.8:

- i) the IMO proposed in the RC\_2014\_07 Rule Change Proposal to amend the word 'granting' to 'when granting'. However, the actual amendments for the Rule Change Proposal and again in the Draft Rule Change Report have specified the amendment as 'to grant'. As this drafting has already undergone two submission periods and the Draft Rule Change Report, the Rule Change Panel is of the view to keep the 'to grant' amendment as it is;
- ii) the phrase 'for re-synchronisation in' was proposed to replace 'is' after the word 'permission'. The Rule Change Panel proposes to reject this amendment as section 3.21B of the Market Rules describes decommitment and the permission being sought by Market Participants to decommit a generator; and
- iii) the Rule Change Panel seeks to amend the term 'this clause' before 3.21B to 'section'.

3.21B.8. System Management must document the procedure it follows to granting permission ~~is~~ in accordance with ~~this clause~~ section 3.21B in the Power System Operation Procedure and System Management and Market Participants must follow that documented Market Procedure.

...

Where 'AEMO' appears in clause 3.22.1, this was originally referenced as 'The IMO'.

3.22.1. AEMO must ~~provide~~update the following information ~~to~~in the ~~s~~Settlement ~~s~~System for each Trading Month:

...

...

For clause 4.5.1, the Rule Change Panel rejects removing 'Study' from 'Long Term PASA Study Horizon' as this is a defined term in the Market Rules Glossary.

Where 'AEMO' appears in clause 4.5.1, this was originally referenced as 'the IMO'.

4.5.1. The Long Term PASA ~~Study~~ must be performed annually by AEMO and must ~~address~~considers each of the years in the Long Term PASA Study Horizon.

4.5.2. The Long Term PASA ~~Study~~ must take into account:

...

...

4.7.1. [~~Blank~~ANK]

...

~~4.13.11B~~ [~~Blank~~]

...

Clause 4.27.1 is now blank thus the proposed changes are no longer applicable.

4.27.1. [Blank]

The original intent of the amendments to clause 4.27.2 was to move the obligation on the IMO to monitor total available capacity on the SWIS from clause 4.27.1 to clause 4.27.2. Since then, given the transfer of functions from IMO to AEMO, clause 4.27.2 has been significantly amended to require AEMO to assess Equivalent Planned Outage Hours, so it is nonsensical to give effect to the amendments given the changes in the operation of the clause.

The remaining typographical changes are supported by the Rule Change Panel.

4.27.2. By the ~~twenty-fifth~~25th day of each month, AEMO must assess the number of Equivalent Planned Outage Hours taken in the preceding 12 Trading Months by each Scheduled Generator and Non-Scheduled Generator assigned Capacity Credits for the current Capacity Year.

...

Where 'AEMO' appears in clause 4.27.10, this was originally referenced as 'the IMO'.

4.27.10. Market Participants holding Capacity Credits for Facilities that are yet to commence operation must file a report on progress with AEMO:

- (a) at least once every three months from the date the Capacity Credits are confirmed under clause 4.20.5A; and

...

4.27.10A. [Blank]

...

Clause 4.29.3 has changed since the publication of the Draft Rule Change Report. The proposed changes are no longer applicable.

- 4.29.3. AEMO must determine the following information in time for settlement of Trading Month m:

...

## 5.1. **Definitions**[Blank]

~~5.1.1. A Network Control Service is a service provided by generation or demand side management that can be a substitute for transmission or distribution network upgrades.~~

~~5.1.2. A Network Control Service Contract is a contract between a Network Operator and a Market Participant for the Market Participant to provide a Network Control Service.~~

~~5.1.3. [Blank]~~

~~5.1.4. [Blank]~~

...

~~5.2.1. [Blank]~~

~~5.2.2. [Blank]~~

~~5.2.3. [Blank]~~

~~5.2.4. [Blank]~~

~~5.2.5. [Blank]~~

~~5.2.6. [Blank]~~

~~5.2.7. [Blank]~~

...

~~5.3.1. [Blank]~~

~~5.3.2. [Blank]~~

~~5.3.3. [Blank]~~

~~5.3.4. [Blank]~~

~~5.3.5. [Blank]~~

~~5.3.6. [Blank]~~

~~5.3.7. [Blank]~~

~~5.3.8. [Blank]~~

5.3.9. [Blank]

...

5.4.1. [Blank]

5.4.2. [Blank]

5.4.3. [Blank]

5.4.4. [Blank]

5.4.5. [Blank]

5.4.6. [Blank]

5.4.7. [Blank]

5.4.8. [Blank]

5.4.9. [Blank]

5.4.10. [Blank]

5.4.11. [Blank]

5.4.12. [Blank]

5.4.13. [Blank]

5.4.14. [Blank]

**[Blank]**

**5.5. [Blank]**

5.5.1. [Blank]

5.5.2. [Blank]

5.5.3. [Blank]

5.5.4. [Blank]

...

5.6.1. [Blank]

5.6.2. [Blank]

5.6.3. [Blank]

...

5.8.1. [Blank]

5.8.2. [Blank]

5.8.3. [Blank]

5.8.4. [Blank]

5.8.5. [Blank]

5.8.6. [Blank]

5.8.7. [Blank]

5.8.8. [Blank]

...

~~6.2.4C. [Blank]~~

...

It is proposed to reject the proposed amendments to clause 7.13.1(cB), as System Management is now a part of AEMO, so the amendments are redundant (this was confirmed with AEMO).

7.13.1. System Management must prepare the following data for a Trading Day by noon on the first Business Day following the day on which the Trading Day ends:

...

(cB) the maximum daily ambient temperature at the site of each generating system monitored by a relevant SCADA system for the Trading Day;

...

Where 'AEMO' appears in clause 8.4.5, these were originally referenced as 'the IMO'.

...

8.4.5. If a Metering Data Agent fails to receive confirmation of receipt of a Meter Data Submission in accordance with clause 8.4.4, it must contact AEMO ~~by telephone~~ within one hour of failing to receive confirmation in accordance with clause 8.4.4 to appraise AEMO of the failure of AEMO to provide confirmation of receipt and, if necessary to make alternative arrangements for the submission of the information.

...

8.6.1. A Meter Data Submission must comprise:

...

(e) meter adjustments that stem from actual meter data becoming available or from the resolution of a dispute concerning meter data ("~~MM~~**Meter Dispute**") in accordance with the dispute resolution process in the applicable Metering Protocol, including:

...

...

The Rule Change Panel rejects the proposed amendment to clause 9.2.1, as how Market Procedures are referred to in the Market Rules will be considered by RC\_2015\_01.

Where 'AEMO' appears in clause 9.2.1, this was originally referenced as 'the IMO'.

9.2.1. AEMO must document the settlement process, including the application of taxes and interest, in the Settlement Procedure, and AEMO and Market Participants must follow that documented Market Procedure.

...



The amendment to clause 9.3.2 would require Metering Data Agents to provide metering data to 'the IMO'. With the dissolution of the IMO, the proposed amendment now states AEMO as the appropriate body for receipt of metering data from Metering Data Agents.

9.3.2. Metering Data Agents must provide ~~to the Settlement System, settlement ready~~ AEMO with settlement-ready metering data in accordance with Chapter 8.

...

Where 'AEMO' appears in clause 9.4.7, this was originally referenced as 'the IMO'.

9.4.7. AEMO must confirm receipt, ~~by telephone,~~ of a Capacity Credit Allocation Submission from a Market Participant made in accordance with clause 9.4.6 within 30 minutes of receiving the submission, indicating the matters referred to in paragraphs 9.4.5(a) and (b).

...

9.9.3A. The value of ASP\_Balance\_Payment(m) for Trading Month m is:

$$\begin{aligned} \text{ASP\_Balance\_Payment}(m) = & \\ & \text{Sum}(c \in \text{CAS\_SR}, \text{ASP\_SRPayment}(c,m)) + \\ & \text{Min}(\text{Cost\_LR}(m), \text{Sum}(c \in \text{CAS\_LR}, \text{ASP\_LRPayment}(c,m))) \\ & + \text{Sum}(c \in \text{CAS\_BS}, \text{ASP\_BSPayment}(c,m)) + \\ & \text{Sum}(c \in \text{CAS\_DS}, \text{ASP\_DSPayment}(c,m)) \end{aligned}$$

...

...

~~9.12.1.~~ [Blank]

~~9.12.2.~~ [Blank]

...

~~9.14.2.~~ [Blank]

...

The proposed amendments to clause 9.20.1 have been amended to keep with the intention of the original proposed changes. However, to ensure consistency with the rejection of the amendments to clause 9.2.1, the original amendment 'Market Procedure referred to in clause 9.2.1' has been changed to 'Settlement Procedure'.

This issue will be considered under RC\_2015\_01. Where 'AEMO' appears in clause 9.20.1, this was originally referenced as 'the IMO'.

9.20.1. A Notice of Disagreement must be submitted to AEMO in accordance with the Settlement Procedure, writing and may be mailed, sent by facsimile, e-mailed or submitted electronically to AEMO.

...

# 11 Glossary

...

~~**Derogation:** An exemption or modification to the Market Rules applicable to one or more Rule Participants set out in Chapter 11 of these Market Rules.~~

...

~~**Network Control Service:** Has the meaning given in clause 5.1.1. A service provided by generation or demand side management that can be a substitute for transmission or distribution network upgrades.~~

...

The Rule Change Panel proposes deleting the defined term 'Shareholding Minister', rather than enacting the proposed changes in the RC\_2014\_07 Draft Rule Change Report, as this definition is not used in the Market Rules.

~~**Shareholding Minister:** The Minister responsible for administering the Electricity Corporation Act.~~

...

The Rule Change Panel proposes to amend the proposed new definition for 'Technical Rules' (referred to in the changes to clause 3.2.5) to be consistent with the definition in the Access Code.

The new term 'Technical Rules' has also been reordered in the Glossary to maintain alphabetical ordering.

~~**Technical Code:** A code prescribing technical rules and requirements for access arrangements, established under the Access Code.~~

**Technical Envelope:** The limits for the operation of the SWIS in each SWIS Operating State.

~~**Technical Rules:** has the meaning given in section 1.3 of the Access Code.~~

...

## Appendix 1: Standing Data

...

The Rule Change Panel proposes to change 'clause' to 'section' for Appendix 1 (b)i, (e)i, (g)ii and (i)ii.

...

- (b) for a Scheduled Generator:
  - i. evidence that the communication and control systems required by ~~clause~~section 2.365 are in place and operational;
  - ii. the ~~name plate~~nameplate capacity of the generator, expressed in MW;

...  
xv. any output range between minimum dispatchable loading level and ~~name-plate~~nameplate capacity in which the facility is incapable of stable or safe operation;

...

- (e) for a ~~Non-Scheduled~~Non-Scheduled Generator:
- i. evidence that the communication and control systems required by ~~clause~~section 2.365 are in place and operational;
  - ii. the ~~name-plate~~nameplate capacity of the generator, expressed in MW;

...

- (g) for an Interruptible Load:

...

- ii. evidence that the communication and control systems required by ~~clause~~section 2.365 are in place and operational;

...

- (i) for a Dispatchable Load:

...

- ii. evidence that the communication and control systems required by ~~clause~~section 2.365 are in place and operational;

...

## Appendix 5: Individual Reserve Capacity Requirements

...

The Rule Change Panel notes that the proposed change to Appendix 5, Step 9 has already been addressed by RC\_2017\_06, so it is removed from RC\_2014\_07.

STEP 9: For each Market Customer, i, calculate

$$X(i) = \text{Sum}(i, \text{ILRCR}(i) + \text{NTDLRCR}(i) + \text{TDLRCR}(i))) + \text{Sum}(u, \text{NMNTR}(u) \times d(u,i)) + \text{Sum}(v, \text{NMTDCR}(v) \times d(v,i))$$

...

## Appendix A.

The following table shows all clauses where the Rule Change Panel has differed from the Draft Rule Change Report amendments. This includes new drafting and where parts are rejected.

Changes denoted below for both the proposed Draft Rule Change Report and Call for Further Submissions are based upon the Market Rules as at 1 September 2018. Text in **green** are changes as drafted in the Draft Rule Change Report whereas text in **red** is where the Rule Change Panel has rejected a change or drafted new changes. Explanations are contained in section 4, section 5 and in the commentary boxes in section 8 of this call for further submissions.

Draft Rule Change Report changes	Call for Further Submissions amendments
<p>2.30A.6. AEMO must document the Spinning Reserve costs exemption process in the <b>Registration-Market</b> Procedure <b>referred to in clause 2.31.23</b>, and:</p> <ul style="list-style-type: none"> <li>(a) applicants for exemption from Spinning Reserve costs must follow that documented Market Procedure; and</li> <li>(b) AEMO must follow that documented Market Procedure when processing applications for exemption from Spinning Reserve cost funding.</li> </ul>	<p>2.30A.6. AEMO must document the Spinning Reserve costs exemption process in the <b>Registration</b> Procedure, and:</p> <ul style="list-style-type: none"> <li>(a) applicants for exemption from Spinning Reserve costs must follow that documented Market Procedure; and</li> <li>(b) AEMO must follow that documented Market Procedure when processing applications for exemption from Spinning Reserve cost funding.</li> </ul>
<p>2.31.23. AEMO must document the registration, de-registration and transfer process in <b>the Registrationa Market</b> Procedure, and:</p>	<p>2.31.23. AEMO must document the registration, de-registration and transfer process in <b>the Registration</b> Procedure, and:</p>

2.34.14. AEMO must commence using revised Standing Data ~~from~~:

(a) from 8:00 AM on the Scheduling Day following AEMO's acceptance of the revised Standing Data in the case of:

- i. Standing STEM Submissions;
- iA. Standing Bilateral Submissions;
- iB. Standing Resource Plan Submissions; and
- ii. ~~[Blank] Consumption Increase Prices, Consumption Decrease Prices and Extra Consumption Decrease Prices; and~~
- iii. Standing Data changes stemming from acceptance of an application under clause 6.6.9,

with the exception that the previous Standing Data remains current for the purpose of settling the Trading Day that commences at the same time as that Scheduling Day; ~~and~~

(b) from 8:00 AM on the date proposed by the Rule Participant, or as soon as practicable thereafter, in the case of Consumption Increase Prices and Consumption Decrease Prices; and

(c) as soon as practicable in the case of any other revised Standing Data.

2.34.14. AEMO must commence using revised Standing Data ~~from~~:

(a) ~~8:00 AM on the Scheduling Day following AEMO's acceptance of the revised Standing Data in the case of:~~

- ~~i. Standing STEM Submissions;~~
- ~~iA. Standing Bilateral Submissions;~~
- ~~iB. Standing Resource Plan Submissions;~~
- ~~ii. Consumption Increase Prices, Consumption Decrease Prices and Extra Consumption Decrease Prices; and~~
- ~~iii. Standing Data changes stemming from acceptance of an application under clause 6.6.9,~~

~~with the exception that the previous Standing Data remains current for the purpose of settling the Trading Day that commences at the same time as that Scheduling Day; and~~

from 8:00 AM on the Schedule Day following AEMO's acceptance of revised Standing Data resulting from an application under clause 6.6.9, with the exception that the previous Standing Data remains current for the purpose of settling the Trading Day that commences on the Scheduling Day following AEMO's acceptance of the revised Standing Data;

Draft Rule Change Report changes

Call for Further Submissions amendments

3.2.5. The Technical Envelope represents the limits within which the SWIS can be operated in each SWIS Operating State. In establishing and modifying the Technical Envelope under clause 3.2.6, System Management must take into account:

- (a) ~~respect~~ all Equipment Limits but only to the extent those limits are not inconsistent with the dispatch of Facilities that, but for the Equipment Limits, would be dispatched under clause 7.6.1C;
- (b) ~~respect~~ all Security Limits;
- (c) ~~respect~~ all SWIS Operating Standards;
- (d) ~~respect~~ all Ancillary Service standards specified in clause 3.10; and

- (b) from 8:00 AM on the latter of:
  - i. the date proposed by the Rule Participant; or
  - ii. the date two days following the end of the Trading Day on which AEMO accepted the revised Standing Data,for Consumption Increase Prices, Consumption Decrease Prices and Extra Consumption Decrease Prices; and
- (c) as soon as practicable in the case of any other revised Standing Data.

3.2.5. The Technical Envelope represents the limits within which the SWIS can be operated in each SWIS Operating State. In establishing and modifying the Technical Envelope under clause 3.2.6, System Management must:

- (a) respect all Equipment Limits but only to the extent those limits are not inconsistent with the dispatch of Facilities that, but for the Equipment Limits, would be dispatched under clause 7.6.1C;
- (b) respect all Security Limits;
- (c) respect all SWIS Operating Standards;
- (d) respect all Ancillary Service standards specified in clause 3.10; and

Draft Rule Change Report changes	Call for Further Submissions amendments
<p>(e) <del>take into account</del> those parts of the SWIS which are not designed to be operated to the planning criteria in the relevant Technical <u>RulesCode</u>.</p>	<p>(e) take into account those parts of the SWIS which are not designed to be operated to the planning criteria in the relevant Technical <u>RulesCode</u>.</p>
<p>3.21B.8. System Management must document the procedure it follows <del>to granting</del> permission <del>for re-synchronisation in</del> accordance with this clause 3.21B in the Power System Operation Procedure and System Management and Market Participants must follow that documented Market Procedure.</p>	<p>3.21B.8. System Management must document the procedure it follows <del>to granting</del> permission <del>is in</del> accordance with <del>this clause</del><u>section</u> 3.21B in the Power System Operation Procedure and System Management and Market Participants must follow that documented Market Procedure.</p>
<p>4.5.1. The Long Term PASA <del>Study</del> must be performed annually by AEMO and <del>must address</del><u>considers</u> each of the years in the Long Term PASA <del>Study</del> Horizon.</p>	<p>4.5.1. The Long Term PASA <del>Study</del> must be performed annually by AEMO and <del>must address</del><u>considers</u> each of the years in the Long Term PASA <del>Study</del> Horizon.</p>
<p>4.27.2. <u>AEMO must monitor the total availability of capacity in the SWIS and, b</u>By the <del>twenty-fifth</del><u>25th</u> day of each month, AEMO must assess the number of Equivalent Planned Outage Hours taken in the preceding 12 Trading Months by each Scheduled Generator and Non-Scheduled Generator assigned Capacity Credits for the current Capacity Year.</p>	<p>4.27.2. <del>By the twenty-fifth</del><u>25th</u> day of each month, AEMO must assess the number of Equivalent Planned Outage Hours taken in the preceding 12 Trading Months by each Scheduled Generator and Non-Scheduled Generator assigned Capacity Credits for the current Capacity Year.</p>
<p>9.2.1. AEMO must document the settlement process, including the application of taxes and interest, in <del>the Settlement Procedure</del><u>a Market Procedure</u>, and AEMO and Market Participants must follow that documented Market Procedure.</p>	<p>9.2.1. AEMO must document the settlement process, including the application of taxes and interest, in <del>the Settlement Procedure</del>, and AEMO and Market Participants must follow that documented Market Procedure.</p>

Draft Rule Change Report changes

Call for Further Submissions amendments

9.20.1. A Notice of Disagreement must be submitted to AEMO in accordance with the Market Procedure referred to in clause 9.2.1.~~writing and may be mailed, sent by facsimile, e-mailed or submitted electronically to AEMO.~~

9.20.1. A Notice of Disagreement must be submitted to AEMO in accordance with the Settlement Procedure.~~writing and may be mailed, sent by facsimile, e-mailed or submitted electronically to AEMO.~~

**Shareholding Minister:** -The Minister responsible for administering the Electricity Corporations Act.

~~**Shareholding Minister:** -The Minister responsible for administering the Electricity Corporations Act.~~

**Technical RulesCode:** The rules established under the Access Code that specify the technical requirements to be met by Western Power on the transmission and distribution system and by users who connect facilities to those systems.~~A code prescribing technical rules and requirements for access arrangements, established under the Access Code.~~

~~**Technical Code:** A code prescribing technical rules and requirements for access arrangements, established under the Access Code.~~

**Technical Rules:** has the meaning given in section 1.3 of the Access Code.



## Appendix 1: Standing Data

...

- (b) for a Scheduled Generator:
  - i. evidence that the communication and control systems required by clause 2.365 are in place and operational;
  - ii. the name-plate capacity of the generator, expressed in MW;
  - ...
  - xv. any output range between minimum dispatchable loading level and name-plate capacity in which the facility is incapable of stable or safe operation;
  - ...
- (e) for a ~~Non-Scheduled~~Non-Scheduled Generator:
  - i. evidence that the communication and control systems required by clause 2.365 are in place and operational;
  - ii. the name-plate capacity of the generator, expressed in MW;
  - ...
- (g) for an Interruptible Load:

## Appendix 1: Standing Data

...

- (b) for a Scheduled Generator:
  - i. evidence that the communication and control systems required by ~~clause~~section 2.365 are in place and operational;
  - ii. the ~~name-plate~~nameplate capacity of the generator, expressed in MW;
  - ...
  - xv. any output range between minimum dispatchable loading level and ~~name~~nameplate capacity in which the facility is incapable of stable or safe operation;
  - ...
- (e) for a ~~Non-Scheduled~~Non-Scheduled Generator:
  - i. evidence that the communication and control systems required by ~~clause~~section 2.365 are in place and operational;
  - ii. the ~~name-plate~~nameplate capacity of the generator, expressed in MW;
  - ...
- (g) for an Interruptible Load:

Draft Rule Change Report changes

Call for Further Submissions amendments

- ...
- ii. evidence that the communication and control systems required by clause 2.3~~65~~ are in place and operational;
- ...
- (i) for a Dispatchable Load:
  - ...
  - ii. evidence that the communication and control systems required by clause 2.3~~65~~ are in place and operational;

- ...
- ii. evidence that the communication and control systems required by ~~clause~~section 2.3~~65~~ are in place and operational;
- ...
- (i) for a Dispatchable Load:
  - ...
  - ii. evidence that the communication and control systems required by ~~clause~~section 2.3~~65~~ are in place and operational;

## Appendix 5: Individual Reserve Capacity Requirements

...

STEP 9: For each Market Customer, i, calculate

$$X(i) = \text{Sum}(i, \text{ILRCR}(i) + \text{NTDLRCR}(i) + \text{TDLRCR}(i))) + \text{Sum}(u, \text{NMNTCR}(u) \times d(u,i)) + \text{Sum}(v, \text{NMTDCR}(v) \times d(v,i))$$

## Appendix 5: Individual Reserve Capacity Requirements

...

STEP 9: For each Market Customer, i, calculate

$$X(i) = \text{Sum}(i, \text{ILRCR}(i) + \text{NTDLRCR}(i) + \text{TDLRCR}(i))) + \text{Sum}(u, \text{NMNTCR}(u) \times d(u,i)) + \text{Sum}(v, \text{NMTDCR}(v) \times d(v,i))$$