

Wholesale Electricity Market Rule Change Proposal Submission

Call for Further Submissions: Formalisation of the Process for Maintenance Applications (RC_2015_03)

Submitted by

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Submissions on Rule Change Proposals can be sent by:

Email to: rcp.secretariat@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.

The Australian Energy Market Operator (**AEMO**) appreciates the opportunity to provide this submission to the Rule Change Panel in response to the Call for Further Submissions: Formalisation of the Process for Maintenance Applications (RC_2015_03) (**CFFS**).

AEMO supports the proposed changes in the CFFS and considers that they will:

- enable AEMO to clearly define the consumption deviation application process for both Relevant Demand and Non-Temperature Dependent Load assessments;
- lower AEMO's operational costs by reducing the number of incomplete or erroneous submissions received; and
- allow for cost recovery through a causer pays model.

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

AEMO agrees with the Wholesale Market Objectives assessment in the Independent Market Operator's Rule Change Proposal submitted on 25 March 2015.

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.

Should the Formalisation of the Process for Maintenance Applications (RC_2015_03) Rule Change (**RC_2015_03**) proceed as currently drafted in the CFFS, AEMO will be required to develop and consult on a new Market Procedure as required by clauses 4.26.2CD and 4.28.9E.

No system changes are anticipated as a result of the proposed changes in the CFFS.

AEMO expects that the cost associated with this developing this Market Procedure should not exceed \$20,000. These costs are included in AEMO's BAU activities and do not have additional impacts on Market Fees.

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

If RC_2015_03 is approved with the changes proposed in the CFFS, AEMO will be required to create a new Market Procedure to ensure it remains compliant with its obligations under the Wholesale Electricity Market Rules.

The new Market Procedure will be subject to the Procedure Change Process defined in the Wholesale Electricity Market Rules and is expected to take approximately six months. This estimate assumes that there will not be any material objections to the Consumption Deviation Application process currently followed by Market Participants and AEMO.

To enable due consideration and consultation on the new Market Procedure, AEMO recommends a commencement date of no earlier than 31 July 2019.
