

## Wholesale Electricity Market Rule Change Proposal Submission

### RC\_2015\_03: Formalisation of the process for maintenance applications (Call for Further Submissions)

**Submitted by:**

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Submissions on Rule Change Proposals can be sent by:

Email to: [rcp.secretariat@rcpwa.com.au](mailto: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.**

Alinta Energy (**Alinta**) welcomes the opportunity to provide a submission to the Rule Change Panel on its *Call for further submissions* for the Rule Change Proposal: *Formalisation of the process for maintenance applications (RC\_2015\_03)*.

Alinta supports the proposal to formalise and prescribe a process in the Market Rules for consumption deviation applications, including introducing a head of power for AEMO to document the process in a Market Procedure.

Alinta considers that an application fee for submitting a consumption deviation application may not be needed, particularly for compliant submissions. The reasons for this are detailed below.

The original rule change proposal noted that:

*The majority of the consumption deviation applications received by the IMO do not meet the requirements for the information provided as evidence. The IMO must therefore reject the application, request further information and/or clarify the provided information, incurring administrative costs for the IMO of around \$150 per application*

processed.

Alinta considers that, if the process for consumption deviation applications was sufficiently detailed and communicated effectively, many of the issues the IMO experienced in the past should not materialise in the future. As such, there may not be a need to introduce an application fee for submitting a consumption deviation application (as per the original proposal).

Alinta considers that the Rule Change Panel should consider the following alternative as a more preferable rule:

- A participant can make an initial consumption deviation application without attracting an application fee.
- If the consumption deviation application is not compliant with the requirements in the Market Rules and/or the Market Procedures, which results in AEMO having to request further information and/or clarify the provided information, then the applicant should be required to pay a processing fee.

Alinta's proposal mirrors similar processes in the Market Rules, for example - in the case of an application for conditional certification for a future Reserve Capacity Cycle, **or subsequent applications for Early Certified Reserve Capacity for a Facility for the same Reserve Capacity Cycle**, a participant is required to pay an Application Fee to cover the cost of processing the application.

In the assessment of the original proposal against the Wholesale Market Objectives the IMO noted that it considered:

*...that the proposed amendments to allocate the costs of processing consumption deviation applications to the applicant will provide for a more equitable cost allocation where the costs are born by and can be managed by the causer.*

Alinta notes that, under the original proposal, the only way for the causer to manage the costs is to not submit a consumption deviation application. Alinta's proposal, outlined above, provides a real mechanism by which the applicant can manage its costs i.e. ensuring that its application is compliant with the Market Rule and/or Market Procedure requirements. Alinta considers that its suggested refinements would better reflect the Wholesale Market Objectives.