

## Wholesale Electricity Market Rule Change Proposal Submission

**RC\_2018\_07**

### Removal of constrained off compensation for Outages of network equipment

**Submitted by**

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<b>Date submitted:</b>	<i>28 March 2019</i>

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Submissions on Rule Change Proposals can be sent by:

Email to: [support@rcpwa.com.au](mailto:support@rcpwa.com.au)

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

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

Bluewaters welcomes the above RCP Draft Rule Change Report issued on 27 February 2019. As detailed in the report, the proposed rule change has broad support, including that of Bluewaters, through recognition of the alignment to the Market Objectives.

As outlined in the first submission period, the materiality of payments that Market Customers were exposed to in the situation that occurred in 2018 is a clear unintended consequence of the rules design.

Bluewaters notes the modifications to the Rule Proposal as outlined in section 5.3 of the Report and has no further suggested amendments.

Bluewaters also supports the proposed commencement of 1 July 2019 given the material costs that Market Customers are currently exposed to.

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

Bluewaters agree with the RCP assessment on the ability for the rule change to deliver the Wholesale Market Objectives.

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**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.**

As commented in the previous submission, system procedural changes will be required to incorporate the rule change but the costs to do so are considered minimal.

The inclusion of 7.7.7B is welcome as this removes the obligation to confirm receipt of Operating Instructions which would have created unnecessary process burden for the purpose of the rule change.

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

As commented in the previous submission, the application of the proposed rule change will only add slightly increased administrative burden to Bluewaters in addition to the existing requirements under Outage rules.

As a Market Customer, there will be offsetting time previously spent attempting to verify constrained off charges applicable to Bluewaters.

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