

## Stacey Oldfield

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**From:** Wendy Ng [Wendy.Ng@verveenergy.com.au]  
**Sent:** Wednesday, 31 August 2011 4:59 PM  
**To:** Market Admin  
**Cc:** Trading Contracts (Verve Energy); Andrew Everett (Verve Energy); Liza Stephenson  
**Subject:** Submission to 5 Year Outage Planning Review

**Importance:** High

To the Market Development Team

Verve Energy would like to make the following submission on the 5 Year Outage Planning Review.

Finding	Recommendations	Verve Comment
In our view the requirement currently within the PSOP which effectively requires Market Participants to be available prior to an outage commencing is misdirected. These provisions of the PSOP should be amended.	System Management should develop proposed changes to Sections 13.5, 14.7 and 15.5 of the PSOP: Facility Outages to the effect that the written declaration pertains to the period of the outage, rather than a period prior to the outage commencing.	Verve does not support this recommendation. The logic is flawed as by this requirement, an outage would not be approved to perform work which if not undertaken, may lead to a forced outage. This would apply to most outage requests.  Outages are taken to perform maintenance and address emergent work to keep plant in full operating condition and to prevent unplanned unavailability. If the outage is not taken, the facility may well become unavailable due to required maintenance not being performed.  Verve also notes that all participants already have an obligation to declare any forced outage under MR 3.21.  Verve believes that if a facility is on a forced outage and sufficient reserve margin exists to permit a planned outage, then the facility should be able to convert to an approved outage subject to the normal timing requirements and margin assessment criteria of a normal planned outage.
The cluster of issues associated with the timelines, insofar as they relate to both scheduled and opportunistic maintenance can and should be addressed by changes to both the Market Rules and the PSOP: Outage Planning. The effect of our proposed changes would be to both give greater certainty and lead times for longer term scheduled outages and improve the coordination with the market timelines for the shorter term opportunistic maintenance outages.	System Management should consider amendments to the PSOP: Outage Planning and, if necessary, the Market Rules to allow a limited number of advanced-approval outages per Facility per year.	Verve queries whether this is seeking to limit the number of opportunistic outages that can be taken on a facility?  Verve queries that as these would be advanced-approved outages, will they then be exempt from the normal approval process?  Verve does not see any merit in this approach over the existing opportunity maintenance arrangement.
Similarly we find no reason why the Market Rules should prohibit opportunistic maintenance to span more two trading days. The offending provision within the Market Rules should also be amended.	The IMO should propose a rewording of Rule <b>MR 3.19.3A(b)</b> to the effect that Opportunistic Maintenance can be granted over any 24 hour period, irrespective of whether it overlaps Trading Days.	Verve strongly supports this as by nature opportunity maintenance is driven by emergent work and this recommendation will facilitate short duration maintenance being performed when needed and when resources are available.

If the IMO wishes to seek clarity on any of the issues addressed above, please don't hesitate to call me.

Regards

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