Wholesale Electricity Market Rule Change Proposal Submission Form

<RC_2008_14> Information from Network Operators

Submitted by

Name:	Alistair Butcher
Phone:	9427 5787
Fax:	9427 4228
Email:	Alistair.butcher@westernpower.com.au
Organisation:	System Management
Address:	
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Submission

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

System Management agrees with the intention of the proposal but considers that the intended amendment requires an addition.

It is occasionally necessary for the IMO to consult with System Management regarding applications for Certified Reserve Capacity. This consultation may involve the dissemination of information received from the network operator which would, in the context of the Rule change as drafted, be precluded. It is submitted that the rule change be amended to include System Management within the "Rule Participant Network Restricted" confidentiality class, to allow the IMO to make available information to System Management where necessary to assist in the exercise of its reserve capacity functions.

The amendment System Management proposes to the rule change (new clause 10.2.2(g)) has been included as underlined text:

10.2.2. The classes of confidentiality are:

(a)

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.....

- (e); and
- (f)and
- Rule Participant Network Restricted, in which case the relevant information or (g) documents may only be available to:
 - i. a specific Rule Participant;
 - ii. the relevant Network Operator;
 - iii. System Management;
 - iv. the IMO;
 - the Energy Review Board; v.
 - the Economic Regulation Authority; and vi.
 - any other Regulatory or Government Agencies in accord with applicable laws. vii.

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

This Rule Change and the revisions suggested by System Management will ensure more efficient and effective Market processes in line with the Market objectives.

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.

This Rule Change and the revisions suggested by System Management would not involve any changes in System Management's IT systems.

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

System Management will be able to alter internal processes to implement this Rule Change by the expected commencement date.