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**Wholesale Electricity Market  
Rule Change Proposal Submission Form**

**<RC\_2008\_20> Demand Side Management – Operational Issues**

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**Submitted by**

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<b>Date submitted:</b>	28 August 2008

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**Submission**

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

This submission does not address the intended rule change, but is confined to advising the IMO of the necessary consequences of this rule change.

As foreshadowed by the IMO in the rule change proposal, System Management has identified a number of elements of the proposed rule change which require consequential amendments to be made to Power System Operating Procedures. System Management has commenced a detailed assessment of the necessary changes to Power System Operating Procedures and will subsequently commence on the procedure change process.

Whilst there is no impediment to commencing those aspects of the proposed rule change which do not also require Procedure changes, where Procedure changes are necessary it is System Management's view that the rule changes should commence in tandem with necessary changes to the Power System Operating Procedures.

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

No comment is made.

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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.**

No changes to IT systems would be involved.

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

This proposed rule changes require consequential amendments to a number of System Management's Power System Operating Procedures. Proposed procedure changes will be prepared and the change process commenced following greater certainty as to the specific content of rule changes arising from this rule change proposal.

It is System Management's view that the rule changes necessitating Procedure changes should be delayed for a reasonable period to allow those Procedure changes to also commence.

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