
Wholesale Electricity Market – Rule Change Proposal Submission Form

RC_2008_21

Local Black Start Procedures

Submitted by

Name:	Graeme Alford
Phone:	9475 0144
Fax:	9475 0173
Email:	graeme@landfillgas.com.au
Organisation:	Landfill Gas & Power Pty Ltd
Address:	PO Box 861 CLOVERDALE WA 6985
Date submitted:	25 July 2008

Submission

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

LGP supports the intent of the proposed Rule Change on the grounds that System Management must be given all necessary information in order to allow it to make operational plans for restarting the system. We suggest that the drafting needs to be clarified per the following points:

- a) Given that clause 3.7.3 is a directive, the first line of 3.7.4 is redundant.
- b) The existence of the first line of 3.7.4 may be taken to imply that not all generators are required to participate. However, this seems to be negated by the second and third lines which specify all Scheduled Generators and Non-Scheduled Generators.
- c) In clause 3.7.6, please clarify the object of the phrase “if required”; does it mean that a generator may be required to produce a procedure and if so, must do so, and if not required, need not produce a procedure; or does it mean that all generators must produce a procedure and must submit it to system management only if requested?
- d) Suggest incorporate clause 3.7.7 into clause 3.7.6 by changing in 3.7.6 the word “request” to “require”.

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

LGP supports System Management's contention that the Rule Change would significantly assist System Management in the preparation of plans to restart the network, thereby promoting the safe and reliable production and supply of electricity.

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

LGP would incur no organisational costs as a consequence of adopting the change.

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

LGP would be able to implement this Rule Change immediately.
