
Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2010_34 Provision of Commissioning Information by System Management

Submitted by

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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 a further change that would allow all information that is provided by SM to the market for their consideration in formulation of STEM submissions to be provided at the same time.

Currently the proposal assumes the commissioning information for a trading day will be provided by 7:30am on the scheduling day. However, this would place it out of sequence with other information that is provided by System Management similar purposes (that is, the formulation of STEM submissions).

The purpose of this is to provide information to participants about the state of the facilities for all participants in order to develop their STEM submissions. System Management currently provides outage information for this purpose (Rule 7.3.4). This is given below:

“7.3.4. System Management must provide to the IMO the following information:

(a) a schedule of Planned Outages, Forced Outages and Consequential Outages for each Registered Facility of which System Management is aware at that time where outages are calculated in accordance with clause 3.21.6;

(b) [Blank]

for each Trading Interval of a Trading Day, between 8:00 AM and 8:30 AM on the Scheduling Day prior to the Trading Day.”

System Management considers that it is better to send all these files together for consistency of application and clarity of rules.

Hence, System Management suggests that the proposed clause amendment be changed to:

“3.21A.16 By ~~4.30pm~~ 8:30 am each day System Management ...”

Additionally, it requests the IMO consider making this obligation part of section 7.2 (or 7.3) and removing Rule 3.21A.16.

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

System Management believes that the proposed changes address the manifest error highlighted.

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 will involve changes to System Management’s IT systems, PSOP’s and associated internal processes.

Progressing this rule change through fast track has prevented an accurate cost assessment although IT system changes are relatively straightforward and costs are likely to be in the vicinity of \$5000 (including specification, development and testing).

However, SM is currently in the process of estimating the effort and costs associated with making amendments to the PSOP’s under the market rules as they currently stand.

Although that work is not completed, on the basis of preliminary estimates, it is anticipated that the cost to the market of implementing this change to internal processes will exceed the IT implementation cost by an order of magnitude.

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

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