

The background of the lower half of the page is a photograph of a wind farm and power lines, overlaid with a semi-transparent blue filter. On the left, several white wind turbines are visible, with their blades extending outwards. On the right, a tall metal lattice tower for power lines stands prominently, with several power lines stretching across the frame. The overall scene is set against a clear sky.

Independent Market Operator

**Rule Change Notice Title:
Use of forecasts in SRC
assessment**

Ref: RC_2010_35

Fast Track Rule Change Process

Date: 18 November 2010

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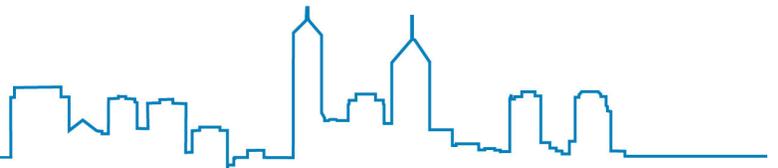
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1. THE RULE CHANGE PROPOSAL

1.1. The Submission

On 17 November 2010 the Independent Market Operator (IMO) developed a Rule Change Proposal regarding amendments to clause 4.21.1 and the Glossary of the Wholesale Electricity Market Rules (Market Rules).

This Rule Change Notice is published according to clause 2.5.7 of the Market Rules, which requires the IMO to publish a notice when it has developed a Rule Change Proposal.

1.1.1 Submission details

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Address:	Level 3, Governor Stirling Tower, 197 St Georges Terrace, Perth
Date submitted:	17 November 2010
Urgency:	High
Change Proposal title:	Use of forecasts in SRC assessment
Market Rules affected:	4.24.1 and the Glossary

1.2. Details of the Proposal

Background

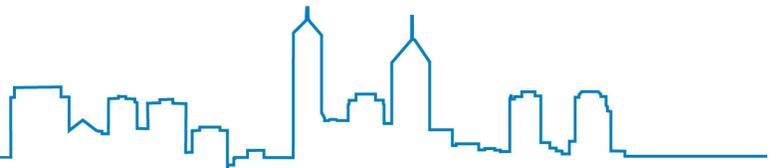
In its Rule Change Proposal, the IMO notes that it must seek to acquire supplementary reserve capacity (SRC) if it considers, at any time after the Reserve Capacity Auction has occurred or has been cancelled, that inadequate Reserve Capacity will be available in the South West interconnected system (SWIS).

In making its determination that SRC is required, the IMO must make reference to clause 4.5.9 of the Market Rules, which outlines the Planning Criterion that is used to set the Reserve Capacity Target for each year in the Long Term PASA Study Horizon. The Long Term PASA Study Horizon is defined in the Market Rules as the ten year period commencing on 1 October of Year 2 of a Reserve Capacity Cycle.

The IMO notes that it has historically provided forecasts in the Statement of Opportunities for the Capacity Year commencing on 1 October of Year 1 of each Reserve Capacity Cycle, in addition to the ten year Long Term PASA Study Horizon period. Although this has not been a requirement of the Market Rules, the IMO has considered that this additional forecast provides beneficial information for Market Participants.

Issue

The IMO contends that the Market Rules currently limit the IMO's assessment of SRC requirements to those forecasts that are developed for the Long Term PASA Study Horizon. As



the Long Term PASA Study Horizon does not commence until 1 October of Year 2 of a Reserve Capacity Cycle, the IMO is thus unable to use the demand forecasts from the most recent Statement of Opportunities. The IMO considers that it would be more practical and desirable to perform the assessment of SRC requirements with the most recently available demand forecasts, that is those available from 1 October of Year 1 of each Reserve Capacity Cycle.

The IMO also considers that the Long Term PASA Planning Horizon should begin from 1 October of Year 1 of a Reserve Capacity Cycle. The IMO considers that this will improve the information available to Market Participants.

The IMO also notes in its proposal that the Market Rules currently refer to the “Planning Criterion”, but this is incorrectly defined in the Glossary as the “Planning Criteria”. The Glossary needs to be amended for consistency.

Proposal

The IMO proposes to amend clause 4.24.1 of the Market Rules to allow the IMO to use the most recent published forecasts in its determination of SRC requirements, removing the current limitation.

In addition, the IMO proposes to amend the Glossary (Chapter 11) to:

- o change the two instances of “Planning Criteria to “Planning Criterion” for consistency with the remaining references in the Market Rules; and
- o amend the Long Term PASA Planning Horizon to begin from 1 October of Year 1 (currently Year 2) of a Reserve Capacity Cycle.

The IMO highlighted the current limitation in the Market Rules to the Market Advisory Committee (MAC) at the October 2010 meeting, and indicated its intent to remove the limitation through a Fast-Track Rule Change Proposal. The MAC generally supported this proposal.

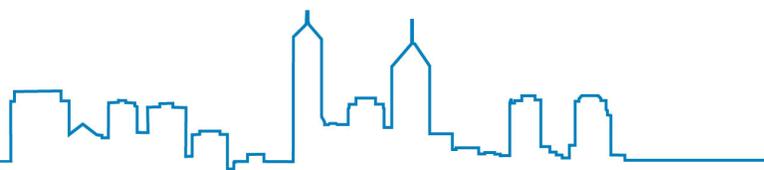
1.3. The Proposal and the Wholesale Market Objectives

Use of forecast information

In its proposal, the IMO notes that the proposed changes to permit the IMO to use the most recent forecasts when assessing the requirements for SRC will have the following impact on the Market Objectives:

Impact	Market Objectives
Allow the Market Rules to better address the objective.	a
Consistent with objective.	b, c, d, e
Inconsistent with objective.	

The proposed changes will allow the Market Rules to better address Market Objective (a) by improving in the IMO’s determination of any SRC requirements for the market. This will result in:



- more economically efficient outcomes, as a call for SRC only being issued when the market actually needs additional capacity; and
- improvements in system security and reliability, by ensuring that the IMO is able to identify that a shortfall in capacity is going to occur and has sufficient time to procure any necessary additional capacity.

Start of the Long Term Planning Horizon

In its proposal the IMO considers that the proposed change to the start date for the Long Term Planning Horizon will have the following impact on the Market Objectives:

Impact	Market Objectives
Allow the Market Rules to better address the objective.	a
Consistent with objective.	b, c, d, e
Inconsistent with objective.	

The proposed changes will allow the Market Rules to better address Market Objective (a) by improving the availability of information for Market Participants and therefore promoting greater economic efficiency.

Planning Criterion

In its proposal, the IMO contends that the proposed changes which change the instances of “Planning Criteria” to “Planning Criterion” are consistent with the operation of the Wholesale Market Objectives.

2. WHETHER THE PROPOSAL WILL BE PROGRESSED FURTHER

The IMO has decided to proceed with this proposal on the basis that Market Participants should be given an opportunity to provide submissions as part of the rule change process.

The IMO has decided to process this Rule Change Proposal using the Fast Track Rule Change Process, described in section 2.6 of the Market Rules, on the basis that it satisfies the criterion in clause 2.5.9(a) and 2.5.9(b) of the Market Rules. Clause 2.5.9 states:

The IMO may subject a Rule Change Proposal to the Fast Track Rule Change Process if, in its opinion, the Rule Change Proposal:

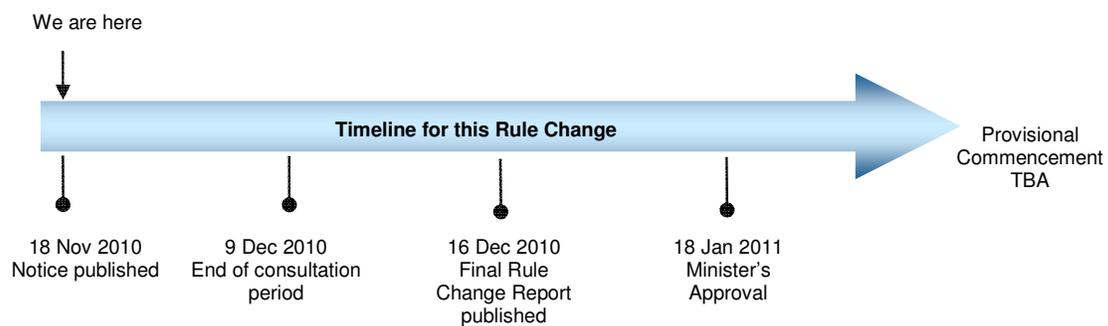
- (a) is of a minor or procedural nature; or*
- (b) is required to correct a manifest error; or*
- (c) is urgently required and is essential for the safe, effective and reliable operation of the market or the SWIS.*



In particular, the IMO submits in its Rule Change Proposal that not allowing the IMO to use the most recently published forecasts in its determination of SRC requirements is a manifest error. As such, the proposal fulfils sub-clause 2.5.9(b) and therefore may be fast-tracked.

The IMO submits that the remaining proposed changes consist of minor amendments which will improve the determination of SRC and the consistency of the Market Rules. There will be no operational impact on the IMO or Market Participants associated with starting the Long Term Planning Horizon from 1 October of Year 1. Additionally, the proposed change to reference the "Planning Criterion" does not seek to amend the operation of the Market Rules. As such the proposal fulfils sub-clause 2.5.9(a), in that it is of a minor in nature, and may therefore be fast-tracked.

The projected timelines for processing this proposal are:



3. CALL FOR SUBMISSIONS

Any Rule Participant wishing to be consulted regarding this Rule Change Proposal is invited to notify the IMO within 5 Business Days of this notice being published (**Thursday, 25 November 2010**).

The consultation period is 15 Business Days from the publication date of this Rule Change Notice. Submissions must be delivered to the IMO by 5.00pm on **Thursday, 9 December 2010**.

The IMO prefers to receive submissions by email to market.development@imowa.com.au using the submission form available on the IMO website: <http://www.imowa.com.au/rule-changes>

Submissions may also be sent to the IMO by fax or post, addressed to:

Independent Market Operator
Attn: General Manager Development
PO Box 7096
Cloisters Square, Perth, WA 6850
Fax: (08) 9254 4399

4. PROPOSED AMENDING RULES

The IMO proposes the following amendments to the Market Rules (~~deleted text~~, added text):

- 4.24.1. If, at any time after the day which is six months before the first Capacity Year the IMO considers that, in its opinion, inadequate Reserve Capacity will be available in the SWIS to ~~satisfy~~ maintain Power System Security and Reliability, using the most recent published forecasts and the methodology ~~the requirements described~~ outlined in clauses 4.5.9(a) and (b), and the Reserve Capacity Auction intended to secure Capacity Credits for that time has already occurred or been cancelled, then it must:
- (a) determine the expected start and end dates for the period of the shortfall;
 - (b) determine the expected amount of the shortfall; and
 - (c) seek to acquire supplementary capacity in accordance with clause 4.24.2.

Chapter 11:

Long Term PASA Study Horizon: The ten year period commencing on 1 October of Year 2 1 of a Reserve Capacity Cycle.

Planning ~~Criteria~~ Criterion: Has the meaning given in clause 4.5.9.

Reserve Capacity Target: In respect of a Capacity Year, the IMO's estimate of the total amount of generation or Demand Side Management capacity required in the SWIS to satisfy the Planning ~~Criteria~~ Criterion for that Capacity Year determined in accordance with clause 4.5.10(b).

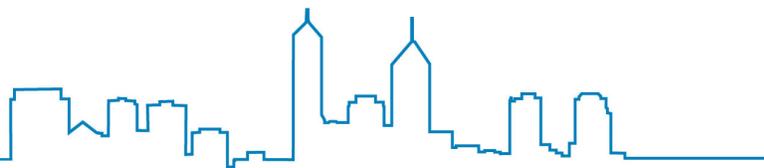
5. ABOUT RULE CHANGE PROPOSALS

Clause 2.5.1 of the Market Rules provides that any person (including the IMO) may make a Rule Change Proposal by completing a Rule Change Proposal Form and submit this to the IMO.

The IMO will assess the proposal and, within 5 Business Days of receiving the proposal form, will notify the proponent whether the proposal will be progressed further.

In order for the proposal to be progressed the change proposal must explain how it will enable the Market Rules to better contribute to the achievement of the Wholesale Market Objectives. The market objectives are:

- (a) to promote the economically efficient, safe and reliable production and supply of electricity and electricity related services in the South West interconnected system;
- (b) to encourage competition among generators and retailers in the South West interconnected system, including by facilitating efficient entry of new competitors;



- (c) to avoid discrimination in that market against particular energy options and technologies, including sustainable energy options and technologies such as those that make use of renewable resources or that reduce overall greenhouse gas emissions;
- (d) to minimise the long-term cost of electricity supplied to customers from the South West interconnected system; and
- (e) to encourage the taking of measures to manage the amount of electricity used and when it is used.

A Rule Change Proposal can be processed using a Standard Rule Change Process or a Fast Track Rule Change Process. The standard process involves a combined 10 weeks public submission period, while the fast track process involves the IMO consulting with Rule Participants who either advise the IMO that they wish to be consulted or the IMO considers have an interest in the change.