

## Wholesale Electricity Market Rule Change Proposal Submission Form

### RC\_2011\_06 Correction of Minor Typographical and Manifest Errors

#### Submitted by

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#### Submission

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

#### Background

From time to time minor grammatical and typographical errors are identified in the Market Rules. These and other minor, but obvious errors are normally logged and then corrected once every so often via a Rule Change Proposal.

The Independent Market Operator (IMO) has identified a number of minor, mostly typographical errors within the Market Rules. Other than grammatical and typographical errors, the minor errors identified by the IMO are as follows:

1. Clause 2.8.11(b) currently refers to the “when the IMO has decided to make the Amending Rules in accordance with clause 2.6.4(h) or clause 2.7.8(g)...” The IMO does not make Amending Rules under either of those clauses. Clauses 2.6.4(h) and 2.7.8(g) merely compels the IMO to make details of the IMO’s decision available in the Final Rule Change Report.
2. Clause 4.1.11(a) and (b) will be amended once RC 2010 14 commences 1 January 2012. RC 2010 14 will change the lodgement date for applications for certification of

Reserve Capacity from the current 20 July deadline to a new 1 July deadline. The change is to take effect from the 2012 Capacity Year. The current text of RC 2010 14 incorrectly states that the 20 July deadline will be in place up until and including 2011 when it should in fact be 2012.

## **Change Proposal**

On 19 August 2011 the IMO submitted a Rule Change Proposal to address the issues identified above.

In relation to issue 1 above the IMO has proposed that the wording of clause 2.8.11(b) be revised to read "...when the IMO has decided to make the Amending Rules as notified under clause 2.6.4(f) or clause 2.7.8(e)".

In relation to issue 2 above the IMO has proposed to substitute the reference to "2010" within clause 4.1.11(a) to be "2011" and the reference to "2011" within clause 4.1.11(b) to be "2012".

The IMO also proposed various changes to correct typographical and grammatical errors.

The IMO decided to progress the Rule Change Proposal under the Fast Track mechanism given that the changes identified were of a minor or a manifest error type of nature.

## **Perth Energy's Views**

Perth Energy supports the IMO's proposal and its decision to use the Fast Track mechanism for this Rule Change Proposal. The proposed changes will contribute to clarify the Market Rules and correct a manifest error in relation to the dates referred to in clause 4.1.11.

When the Market Rules are amended via a Fast Track Rule Change Proposal to correct minor typographical and grammatical errors it would be possible that the amendments inadvertently introduce real changes to the Market Rules (this would be plausible for example when updating cross references between clauses). Perth Energy considers it important that the Fast Track process be available to introduce further amendments to the Market Rules in question to reverse out any such unintended consequences. This provision should be expressed in standard form in all Fast Track Rule Change proposals.

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

Perth Energy considers the proposed changes would have a marginally positive impact on facilitating achievement of Market Objectives<sup>1</sup> (a) and (b) by enhancing the transparency and internal consistency of the Market Rules.

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<sup>1</sup> The objectives of the market are:

Perth Energy has not identified any impacts on the remaining Market Objectives.

**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.**

Perth Energy has not identified any significant cost or IT issues in relation to this change proposal.

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

Perth Energy does not require any lead time to implement the change proposal.

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- (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.