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## Wholesale Electricity Market Rule Change Proposal Submission Form

### RC\_2012\_04 Consequential Outage Correction

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#### Submitted by

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#### Submission

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

System Management has reviewed the IMO's Draft Rule Change Report for RC\_2012\_04: Consequential Outage Correction and provides the following comments.

#### **Coordination of network and generator outages**

In its first submission System Management put forward the potential for the changes proposed by RC\_2012\_04 to circumvent the negotiation process provided for in clause 3.18.13(d) of the Market Rules.

System Management notes the IMO's advice in the draft Rule Change Report that the proposed amendments do not impact on the obligations of a Network Operator to negotiate with a Market Participant when determining an appropriate time to undertake a Planned Outage.

System Management notes that as a result of further discussions with the IMO, consideration may be given to embedding a requirement that the parties must negotiate as part of this Rule Change.

#### **Other issues**

System Management has some residual concerns in relation to RC\_2012\_04. In particular the Rule Change is broadly drafted, and it is not clear if it is intended to apply to partial

capacity constraints within a transmission network region as a result of a transmission planned outage.

System Management has discussed these residual issues with the IMO and will be seeking to further engage with the IMO to address these issues.

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

Taking into consideration its comments above and its discussions with the IMO, System Management is of the view that the proposed changes should better facilitate the Market Objectives.

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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.**

The proposed amendments should require minimal system changes and have minimal resourcing implications.

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

The proposed changes should not require any significant implementation time.