

RC_2012_6: Clarification of Reviewable Decisions and Definition of Regulations

Submitted by

Name:	Steve Gould
Phone:	0408 005 321
Fax:	NA
Email:	steve@eurekaelectricity.com
Organisation:	Community Electricity
Address:	GPO Box 909 West Perth 6872
Date submitted:	10 December 2012

Submission

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

Community Electricity supports the Rule Change Proposal on the grounds that it improves procedural fairness in the event of denial of a Procedure Change suggestion, and otherwise enhances the integrity of the Market Rules through various clarifications and corrections.

In particular we support:

- a) Establishing a right of review by the Electricity Review Board in the event of the IMO or System Management declining a suggestion to change a Market Procedure;
- b) Establishing a requirement for the IMO or System Management, as the case may be, to publish on the Market Website the reasons for its decision;
- c) Increasing to 20 Business Days the time permitted for considering a suggested change to a Market Procedure;
- d) Increasing to 28 Business Days the period during which a participant may apply for a Procedural Review;
- e) Correcting the various definitions of 'regulations' and references to clauses within them.

Addendum

Community supports the IMO's further approved amendments, which we consider to be minor and administrative and therefore appropriate of themselves for a Fast Track change, and appropriate to issue as an amendment to the present Rule Change Proposal.

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

Community considers that the Rule Change improves the clarity and integrity of the Market Rules and is consistent with all the Market objectives.

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

The proposal has no implications for Community.

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

Not applicable
