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## Wholesale Electricity Market Rule Change Proposal Submission Form

### <RC\_2012\_06 - Clarification of Reviewable Decisions and Definition of Regulations>

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#### Submitted by

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<b>Date submitted:</b>	10 December 2012

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#### Submission

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

System Management supports the intent of RC\_2012\_06 seeking to amend clause 2.10.2A to be a Reviewable Decision to provide Rule Participants a right to appeal the IMO's and System Management's decision whether an amendment to a Market Procedure is appropriate. The proposal also intends to amend the market rules to more clearly refer to various relevant Regulations.

#### Reviewable decisions

System Management agrees that clause 2.10.2A does not explicitly require a decision to be made by the IMO or System Management. Therefore, System Management supports the re-drafted clause 2.10.2A.

System Management suggests that the words "the IMO's decision" be added to the beginning of the 2.5.7(e) in order to remove any argument that the decision administered under this clause is the IMO's decision whether to progress the Rule Change Proposal and not the form of, or the IMO's decision to publish, the notice referred to in clause 2.5.7.

### Timeframe to progress Procedure Changes

The introduction of a 20 business day timeframe to enable the IMO or System Management to consider progressing amendments to the Market Procedures is reasonable, on the grounds that it is of a similar duration as a Rule Change Process submission period.

As such, this timeframe provides sufficient time for the IMO and System Management to consider progressing Market Procedure changes.

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

This proposal seeks to strengthen the Procedure Change Process, and as such any decisions made by the IMO and System Management in respect of suggestions provided by Rule Participants will be subject to sufficient scrutiny.

System Management does not believe the amendments suggested in this proposal are inconsistent with 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.**

System Management does not envisage any system changes will be necessary to implement this rule change proposal.

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

System Management envisages it will require 1 month following the commencement of this rule change proposal to amend internal processes necessary to implement this rule change proposal.