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## Wholesale Electricity Market Rule Change Proposal Submission Form

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### RC\_2012\_11 Transparency of Outage Information

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#### Submitted by

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#### Submission

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

Synergy supports RC\_2012\_11 which acts to introduce new standards for the disclosure of outage information to reduce information asymmetry among Market Participants and thereby enhance transparency and improve economic efficiency in the market. Synergy concurs with PA Consulting's recommendation that all information related to outages and outage planning should be published by the IMO and System Management.

Further, Synergy notes and agrees with the IMO's decision to stage the reforms, electing to first to introduce the new disclosure standards for outages and then follow up with considering technical changes to facilitate greater flexibility in the outage planning process.

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

This rule change, through improving outage information transparency, will better achieve the WEM objective (a), through efficiency improvements in the generation of electricity and WEM objective (d) through reduced long term cost of electricity supplied to customers through a faster and therefore more efficient response to outages potentially reducing the total capacity needed to network reliability and security requirements.

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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.**

Synergy believes this rule change will result in minimal system or business costs to the market as a whole as generators are already required to provide System Management/IMO with the outage information. Minor costs may arise for the IMO in making that information available through the market interface and in Synergy accessing that information in an efficient manner; however such costs, in Synergy's view, will likely not outweigh the benefits of information transparency.

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

Synergy may need to change its market interface capability to access the information, in an efficient manner however this is not expected to take a significant amount of time.

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