
Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2012_11 Transparency of Outage Information

Submitted by

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Submission

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

Alinta Energy (Alinta) is generally supportive of increasing the level of transparency regarding outages, as this provides a higher level of timely and relevant information to market participants to allow them to respond and adapt to outages as required. Alinta is of the view the proposed rule change is likely to further facilitate optimal planning by Generators to allow a better response to outages.

Alinta does however note that as RC_2012_11 is only the first phase in addressing current issues surrounding outages, and that Alinta is particularly interested in the technical changes that will be aimed at bringing greater flexibility to Market Participants in outage planning. While Alinta supports RC_2012_11 in its current form, Alinta is likely to view all upcoming market rule changes related to outages as interlinked, and looks forward to seeing the next rule change proposal relating to the general process (and specifically rectifying the current shortcomings) around logging outages.

Alinta's only concern with RC_2012_11 as drafted is the lack of clarity around obligations on both System Management and the IMO in terms of the proposed time frames for publication of data received from Market Participants. While the Rule Change states that System Management must notify the IMO *as soon as practicable* after receiving a notification from a Market Participant, and that the IMO will work with System Management to determine the structure of the information provided, it is not clear to Alinta if this is going to translate to

immediate publication, or 24 hour publication, or an alternative time frame where other Market Participants can have certainty as to when outage information will be published. Alinta would like to see further information as to the frequency that outage information will be updated and published for the wider market to consider.

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

Market Rule 2.4.2 states that the IMO must not make Amending Rules unless it is satisfied that the Market Rules, as proposed to be amended or replaced, are consistent with the Wholesale Market Objectives. The Wholesale Market Objectives are as follows.

- (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.

In particular, the following outcome of the amendments to the Market Rules contemplated by RC_2010_28 is likely to be consistent with the following Market Objectives.

- Market Objectives (a) and (b) will be better met because a greater level of provision of information to Market Participants is likely to result in market generators being able to more efficiently provide electricity to the market over a forward planning horizon. This in turn is likely to result in the more efficient production and supply of electricity in the SWIS.

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 changes to the Market Rules contemplated by RC_2012_11 would require Alinta to undertake some minor updates to its systems in order to comply with the updated disclosure obligations.

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

As the changes to the Market Rules contemplated by RC_2012_11 would require Alinta to update its IT and business systems, Alinta envisages that it would need a few months to ensure that it is able to comply with the updated outage requirements.