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## Wholesale Electricity Market Rule Change Proposal Submission Form

### RC\_2012\_20 Consideration of network constraints for Certified Reserve Capacity

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#### Submitted by

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<b>Date submitted:</b>	1 March 2013

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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 is pleased to make this submission on the

Rule Change Notice

Title: Consideration of network constraints for Certified Reserve Capacity

Ref: RC\_2012\_20

Standard Rule Change Process

Date: 21 January 2013

System Management provides the following comments in response to Rule Change Proposal RC\_2012\_20:

RC\_2012\_20 seeks to account for network limitations in the certification of reserve capacity.

System Management notes there are network connections being made on a “non-reference” basis. That is, they do not meet the stated Technical Rule requirement that:

*“supply must be maintained and load shedding avoided at any load level and for any generation schedule following an outage of any single transmission element”*

It is essential for system reliability planning that these types of connections are carefully considered.

As the proposed rule change reinforces the principle of accounting for the ability of the network to deliver generation or demand side program facilities during the certification of reserve capacity, System Management supports this rule change proposal.

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

System Management believes that the Rule Change proposal's assertion that the change promotes objective (a) (given below) is reasonable.

Objective (a)

“to promote the economically efficient, safe and reliable production and supply of electricity and electricity related services in the South West interconnected system;”

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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.**

This Rule Change Proposal will not involve changes to System Management's IT or business systems.

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

The expected implementation date of this Rule Change Proposal should be achievable as there are no changes required.