



INDEPENDENT
MARKET
OPERATOR

Wholesale Electricity Market Submission to Rule Change Proposal

RC_2013_03 LFAS Facility definition

Submitted by

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Date submitted:	<i>29 April 2013</i>

Submission

Submissions for Rule Changes should be submitted to:

Independent Market Operator

Attn: Group Manager, Market Development

PO Box 7096

Cloisters Square, Perth, WA 6850

Fax: (08) 9254 4399

Email: market.development@imowa.com.au

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

System Management supports the principle of simplifying the WEM Rules.

System Management notes that it already provides the LFAS quantities specified under 7.13.1(e), (eA), (eB) and (eC) so the commercial outcomes alluded to the Rule Change Proposal has yet to eventuate.



System Management agrees that the definition of the LFAS Facility is any one of the following

- a non Verve facility or
- a Stand Alone Facility or
- the Verve portfolio

This should be clearly set out in the Market Rules.

System Management contends the Rule Change Proposal wording (given below) could be made clearer as it suggest an LFAS Facility needs to satisfy 3 conditions simultaneously .

“LFAS Facility: Means:

(a) a Scheduled Generator or a Non-Scheduled Generator registered to a Market Participant other than Verve Energy or a Stand Alone Facility for which:

- i. the relevant Market Participant has indicated in Appendix 1(j)(i) of Standing Data is intended to participate in the LFAS Market; and
- ii. LFAS Standing Data has been accepted by the IMO; and

(b) the Verve Energy Balancing Portfolio.

System Management suggests the following wording is clearer:

“LFAS Facility: Means:

(a) a Scheduled Generator or a Non-Scheduled Generator registered to a Market Participant other than Verve Energy a Facility for which:

- i. the relevant Market Participant has indicated in Appendix 1(j)(i) of Standing Data is intended to participate in the LFAS Market; and
- ii. LFAS Standing Data has been accepted by the IMO;

or

(b) the Verve Energy Balancing Portfolio.

or

(c) a Stand Alone Facility for which LFAS Standing Data has been accepted by the IMO.”

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

System Management believes Rule Change Proposal clarifies the Market Rules

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.

There are no process or system changes for System Management as it already provides the data required..

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

There are no changes required by the proposed change so it could be implemented immediately.

If the proposed change is expanded as System Management proposes System Management would be able to implement the change within 5 business days
