

Wholesale Electricity Market Submission to Rule Change Proposal

RC_2013_10 Harmonisation of Supply Side and Demand Side Resources

Submitted by

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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: <u>market.development@imowa.com.au</u>

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

System Management believes this proposal will contribute towards the market objectives in general.

There are certain aspects of this rule change that System Management feels require more analysis before they can be proven to be beneficial to the market, at this time, specifically Real-Time telemetry requirements for individual loads.

While the Individual loads readings are helpful for validation purposes and to identify potential issues with load telemetry, System Management will only be integrating aggregated DSP load readings into



its real time monitoring systems. In instances where individual DSP load readings do not sum to the same total as the supplied aggregated reading, System Management has no obligation to act on the information and will continue to use aggregated readings in determining a DSP's ability to be dispatched.

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

System Management considers the proposed amendments will better facilitate the achievement of Wholesale Electricity Market objectives.

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 Managements estimated costs have not changed as a result of this draft report. The estimated costs provided supplementary to System Managements first submission were \$272,000 (+/-).

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

Given the lengthy transition time until telemetry requirements come into effect, System Management expects to be able to apply this rule change as of the proposed commencement date of 1 October 2016.

