



INDEPENDENT  
MARKET  
OPERATOR

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## Wholesale Electricity Market Submission to Rule Change Proposal

### RC\_2014\_03 Administrative Outages

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#### Submitted by

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<b>Organisation:</b>	System Management
<b>Address:</b>	
<b>Date submitted:</b>	30/01/2015

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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: [market.development@imowa.com.au](mailto:market.development@imowa.com.au)

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

System Management agrees with the proposal to remove the requirement to lodge a Forced Outage prior to a Consequential Outage and allowing Participants to lodge Consequential Outages in advance.

System Management is unsure of the need to provide additional sent out readings at 15 degrees to the IMO as this will require changes to both IMO and System Management systems. Given that the IMO is capable of doing the temperature conversions itself already, as it is based on standing data, we suggest that System Management continue to only provide 41 degree values to the IMO.



System Management would also like to note that there are still other fundamental issues with Consequential Outages which remain unaddressed (such as the definition of an Outage and current issues with consistency in the application of the Consequential Outage rules). These outstanding issues will likely impact the effectiveness of this rule change proposal. While these issues have been discussed with the IMO in relation to other rule change proposals that are still in progress, they are fundamental to the approval and appropriateness of Consequential Outages.

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

While System Management believes that the changes proposed will assist to better facilitate achievement of the Market Objectives, it also considers that the Market Objectives may be better served by addressing the broader issues with the definition and application of Consequential Outages.

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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.**

System Management will require moderate changes to its IT systems to accommodate the proposed changes. These changes will include validations in the Market Participant Interface and changes to some calculations it currently uses for Non-Scheduled generation outages. The estimated cost for these changes is \$60,000.

This proposal will also require moderate changes to PSOPs, however this work will be completed as part of business as usual.

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

The proposed changes will take approximately 6 months to implement from the date of publication of the Final Rule Change report.

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