



INDEPENDENT
MARKET
OPERATOR

Wholesale Electricity Market Submission to Rule Change Proposal

RC_2013_15 Outage Planning Phase 2

Submitted by

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Submission

Submissions for Rule Changes should be submitted to:

Independent Market Operator

Attn: Group Manager, Market Development
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1. Please provide your views on the proposal, including any objections or suggested revisions.

System Management believes the changes proposed in this Rule Change will clarify requirements for outages and assist System Management to provide greater transparency around generation and network outages.

This proposal simplifies some aspects of the outage approval process and increases System Managements confidence regarding facility availability.



System Management suggests the following changes and additions to the proposal :

1. **MR 7A.2.9** – the IMO has suggested some changes to this Market rule to allow Synergy to update its submissions where it has planned (opportunistic) outages approved after its normal gate closure time. While this certainly assists with improving accuracy of the BMO closer to dispatch, it still does not make allowances for forced outages.

7A.2.9(d) and (f) allow Synergy to resubmit after their gate closure, but only if they will be forced to use liquid plant and it is a 'may' resubmit, not a 'must' resubmit.

7A.2.9(g) allows resubmissions for Synergy to occur after their gate closure where SM approve an opportunistic outage after their gate closure.

SM suggest that Synergy be required to resubmit balancing submissions as soon as they are aware of any outages (including forced) as all other Participants are required to under MR 7A.2.10

2. **MR 3.18.2(b)** – The current wording requires SM to review and update the Equipment List from 'time to time'. SM suggest this be reworded to

“System Management must, as soon as practicable, review and update the Equipment List whenever Facilities or items need to be added, updated or removed from the list. If System Management updates the Equipment list it must provide the IMO with a copy of the updated list in accordance with the Market Procedure.” *(IMS market procedure)

3. **MR 7.13.1D** – One of the intentions of this rule change was to enhance transparency around outage planning. System management assumes this includes transparency around Network outages, however it appears that they have not been included in MR 7.13.1D which currently only requires SM to provide Scheduled and Non-Scheduled generation information to the IMO. SM suggests that if this was the IMO's intention, 7.13.1D be made to apply to outages in general.

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 address the 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.

This Rule Change would require changes to System Managements IT Systems as follows;

- Create new validations and update existing validations in the Market Participant Interface to enforce compliance with Market Rules. In particular, new timeframes and clarifications between outage types.



- Integration of equipment list with MPI to assist participant data entry and validations.
- Creation and maintenance of 'Notional Network circuits' for the Equipment list. These circuits require co-ordination of information between the Western Power Network Planning team and System Management.
- Storage of network outage information within SM market systems along with other Market outage information. The provision of Network Outage information to the IMO for Publications will be handled by the existing outage functionality.

System Management currently operates 2 systems for recording and storing outages, the Market Participant Interface for Generator outages and the Network Operations Interface for Network outages. Discussions with the IMO throughout the development of this Rule change have clarified that network outages should be treated the same as Generation outages, particularly the clarification of what items of the network should be included in the Equipment list. It seems impractical and inefficient for System Management to continue using 2 systems so the IT costs incorporate some of changes required to amalgamate all Outage recording and reporting into 1 system. System Management has obtained two cost estimates based on how this might be achieved.

The cheapest option will require the Western Powers Network Operations area to enter details of planned and forced outages via the MPI in the same manner as all other Participants.

Based on the information in this proposal, the estimated cost for all IT changes listed above is \$135,738.

Along with the IT changes mentioned, System Management will be making changes to its internal processes for managing network outages and approvals, making them more consistent with the processes used for generation outages. These changes are designed to create efficiencies within System Management and provide greater transparency around Network Outages and their impact on dispatch and market activities.

System Management notes that these changes may have significant impacts on the Network Planning operations and is currently in discussions with Western Power to determine the best means of implementing the changes.

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

System Management estimates that the proposed IT changes can be implemented within 9 months of this rule change being finalised. The implementation will be done in 2 parts with the validation work being completed within 3-4 months and the equipment list and Network outage changes being completed within 9 months.

The definition, process and operational changes relating to the 'Notional Circuit' concepts within System Management and Network planning is estimated to take 12 months from the date of finalisation.
