



INDEPENDENT
MARKET
OPERATOR

Wholesale Electricity Market Submission to Rule Change Proposal

RC_2013_15 Outage Planning Phase 2

Submitted by Network Operations, Western Power

Name:	Dean Frost
Phone:	(08) 9427 4214
Fax:	
Email:	dean.frost@westernpower.com.au
Organisation:	Western Power
Address:	GPO Box L921, PERTH WA 6842
Date submitted:	28 February 2014

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.**

Western Power has used best endeavours to provide planned outage notification to all customers. Over the past 6 months, we have reviewed some of our operational practices and made appropriate changes. We will continue to review and improve our planned outage notification processes.

It is the Network Operator's view that any generation system with a nameplate capacity of less than 10MW should not be included on the Equipment List. Our particular concern is in relation to distribution facilities, which are generally connected to shared distribution



networks. Inclusion of distribution system equipment (that could limit output of a generation system) on the Equipment List will present some challenges for the Network Operator to manage in the future. At this stage, it is unclear how the proposal (to include distribution equipment) will materially benefit the market and Western Power.

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

Western Power supports the proposal to restrict the facilities to generators holding capacity credits with a nameplate capacity of at least 10MW, as there is no value in including demand/load management arrangements in the Equipment List.

Western Power supports the clarification of clause 3.19.1, as this removes the ambiguity concerning the timing for scheduled outage approvals.

The proposed amendment to clause 3.18.7 clarifies the Network Operator's obligations regarding outage plans which will impact on facilities in the Equipment List.

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.

Inclusion of distribution system equipment in the Equipment List will require an enhancement to the Network Operator Interface as well as some process re-engineering. Both aspects will take time and will incur costs which have not been budgeted by Western Power in the Access Arrangement 3. Western Power would like to discuss this matter with the IMO, as there may be an alternative approach.

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

At this stage, any enhancement to the Network Operators Interface is likely to be postponed to the 4th Access Arrangement period (ie. 2017/18 or later). Process re-engineering, where it makes sense to do so, can obviously be initiated earlier.
