Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2010_31 De-registration of Rule Participants who no longer meet registration requirements

Submitted by

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Submission

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

Draft Rule Change Report Title: De-registration of Rule Participants who no longer meet registration requirements

Ref: RC_2010_31

Standard Rule Change Process

Date: 1 June 2011

System Management support the premise that registration of participant should reflect the bona fide status of that participant.

System Management submits the following additional issue.

1 Facility Registration

The IMO submitted that

"the proposed amendments will promote Wholesale Market Objective (a) by ensuring that the IMO does not need to undertake a lengthy and costly process of applying to the ERB should it wish to de-register Rule Participants. The IMO considers that its proposed process is a more economically efficient process than the status quo."

System Management the same philosophy must apply to facility registration.

Currently a facility may only be de-registered by a Participant submitting a deregistration form with the appropriate fee as per Market Rule 2.33.4. System Management believes there is little incentive for Participant to participate in this process.

In addition, the Market Rules do not provide a process of how the IMO may deregister a facility if it no longer meets an acceptable criteria.

In terms of System Management, it is required to schedule and dispatch "Registered Facilities" as per Market Rule 7.6.

Currently there are approximately one hundred "Registered Facilities", predominantly curtailable loads, whose capacity is recorded at 0 MW which must be dispatched by System Management. Dispatch of Registered Facilities of this quantum is clearly an inefficient process.

System Management contends that this rule change proposal be expanded to include deregistration of facilities.

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

System Management believes that the proposed changes will better facilitate the achievement of the 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 Proposal will not involve changes to System Management's IT systems.

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

The expected that System Management will be able to implement the proposed rule change on its commencement date.