



INDEPENDENT  
MARKET  
OPERATOR

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## Wholesale Electricity Market Submission to Rule Change Proposal

### RC\_2013\_18 Merger of Electricity Retail Corporation and Electricity Generation Corporation

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#### Submitted by

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<b>Organisation:</b>	System Management
<b>Address:</b>	
<b>Date submitted:</b>	02 December 2013

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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)



**Rule Change Proposal Submission Form:**

RC\_2013\_07 – Correction of Minor and Typographical Errors

DM # 11291389

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

System Management has no objection to the proposed rule change but would make the following comments.

**Issue 4.** The current drafting of the definition of the Balancing Portfolio is such that it would inadvertently include Synergy's DSPs, Interruptible Loads and Dispatchable Loads from the Merger Time.

It is noted in this issue that the inclusion of Synergy's DSP's, Interruptible Loads and Dispatchable Loads into the Verve portfolio would be a manifest error as the Facilities are not Balancing Facilities. Verve Energy currently has two facilities, PPP\_KCP\_IL1 and WAPL\_WORSLEY\_IL1, registered as Non-Dispatchable Loads that sit within the Portfolio. System Management is unsure whether these facilities will, or should, remain in the Portfolio.

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

No Comment

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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 believes this rule change will have minimal impact to its operations. Testing of IT systems will be necessary to verify IMO registration changes, however no specific IT changes or costs have been identified.

System Management will incur administrative costs for updates required to the various chapters of its Power System Operation Procedure to reflect the rule change.

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

System Management could implement the proposed changes prior to 1 January 2014.

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