

Wholesale Electricity Market Rule Change Proposal Submission

RC_2015_01 – Removal of Market Operations Market Procedures

Submitted by

Name:	Martin Maticka
Phone:	(08) 9469 9800
Email:	Martin.Maticka@aemo.com.au
Organisation:	AEMO
Address:	GPO Box 2008, Melbourne VIC, 3001
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Submissions on Rule Change Proposals can be sent by:

Email to: support@rcpwa.com.au

Post to: Rule Change Panel
Attn: Executive Officer
C/o Economic Regulation Authority
PO Box 8469
PERTH BC WA 6849

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

The Australian Energy Market Operator (**AEMO**) appreciates the opportunity to provide this submission to the Rule Change Panel in response to the Draft Rule Change Report: Removal of Market Operation Market Procedures (RC_2015_01) (**Draft Rule Change Report**).

While AEMO supports the intent of the Draft Rule Change Report, as it enables AEMO to efficiently manage the suite of Market Procedures and Power System Operation Procedures (**PSOP**) required under the Market Rules, it has identified a minor issue with the proposed Amending Rules with respect to clause 2.9.2D.

As currently drafted, AEMO would be required to publish the information required by clause 2.9.2D for all Market Procedures and PSOPs, including those which it is not responsible for maintaining. AEMO considers that this obligation is not appropriate for procedures that it is not responsible for under the Market Rules, as it has no control over the content, nor when or how they are maintained. Therefore, AEMO requests that clause 2.9.2D be updated to only include those Market Procedures and PSOPs that AEMO is responsible for.

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

AEMO agrees with the assessment detailed in Section 5.3 of the Draft Rule Change Report.

- 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.**

AEMO proposes to undertake a review, prior to commencement of the Amending Rules, to assess whether the list of AEMO Market Procedures and PSOPs currently available on the Market Web Site¹ is compliant with proposed new clauses 2.9.2D and 2.9.2E and will make any amendments, as necessary, to ensure the list is compliant.

This is a business-as-usual task and will not result in any additional costs.

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

AEMO anticipates that it will have sufficient time to complete the review of the Market Rules to ensure the publication requirements of clause 2.9.2D can be met by the 1 August 2019 proposed commencement date, as referenced in the Draft Rule Change Report.

¹ <https://www.aemo.com.au/Electricity/Wholesale-Electricity-Market-WEM/Procedures>