

**Wholesale Electricity Market Rule Change Proposal Submission
RC_2013_15
Draft Rule Change Report: Outage Planning Phase 2 – Outage
Process
Submitted by**

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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.

Bluewaters welcomes the opportunity to provide comments on the above Draft Rule Change Report and appreciates the extensive consultation conducted with market participants to progress this Rule Change Proposal. Bluewaters agrees with the proposed changes with the exception of the clause 7A.2.8A. We question whether this clause is in line with the desired outcome of improving market efficiency by placing barriers to entry on market generators that wish to return early from a Planned Outage.

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

As discussed above, Bluewaters is concerned that clause 7A.2.8A places an additional barrier to entry on generators wishing to return early from a Planned Outage. The requirement to update System Management's Market Participant Interface in real time introduces administrative burden on generators wishing to return to service earlier than expected, reducing the availability of low cost generation to the market. Bluewaters considers this to be at odds with the Wholesale Market Objective to reduce long term cost of electricity supplied to consumers.

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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.**

Bluewaters does not anticipate any substantial implications or costs as a result of implementing these changes.

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

Bluewaters does not expect any time required in order to implement this change.
