

Our ref: EDM 50778603

6 November 2019

Stephen Eliot
Executive Officer
Rule Change Panel
PO Box 8469
Perth BC WA 6849

Dear Stephen

Submission for the 2019 Rule Change Proposal Prioritisation and Scheduling Framework Review

Western Power welcomes the opportunity to respond to the Rule Change Panel's (**Panel's**) proposed amendments to the Rule Change Proposal Prioritisation and Scheduling Framework (**Framework**). Western Power is generally supportive of the proposed amendments to the Framework and considers that it would better assist the Panel with its management of Rule Change Proposals (**Proposals**).

Western Power is of the view that the following additions to the Framework would result in a more holistic assessment process, particularly when the Panel determines the priority of a Proposal:

a) Section 4.1 of the proposed Framework – Factors impacting the Priority of a Proposal

Western Power notes that when undertaking an assessment process to prioritise each Proposal, the Panel would (amongst other things) consider the "IT and process implementation cycles for AEMO and Market Participants".

Western Power is of the view that the IT and process implementation cycles for the Network Operator should also be considered by the Panel and included as a factor under Section 4.1 of the proposed Framework. If a Proposal requires changes to the Network Operator's IT systems and/or processes, it would be prudent for the Panel to consider the implementation of these changes when determining the priority of the Proposal.

b) Section 5.1 of the proposed Framework – Prioritisation of Proposal

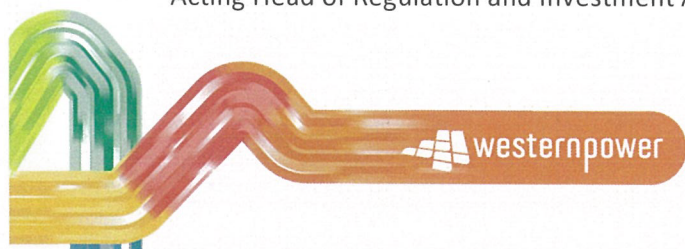
Similarly, when considering the prioritisation of Proposals for the Rule Change Panel Support work plan, Western Power is of the view that the Executive Officer should also consider the timing for IT and process development and testing by the Network Operator.

Western Power would appreciate if the Panel can consider the above additions to the Framework. Should you have any queries, please contact Rudi James, Regulatory Compliance Manager on (08) 9326 6413.

Yours sincerely



Matthew Veryard
Acting Head of Regulation and Investment Assurance



363 Wellington Street Perth 6000
GPO Box L921 Perth WA 6842
westernpower.com.au



† 13 10 87
f (08) 9225 2660
TTY 1800 13 13 51
TIS 13 14 50

Electricity Networks Corporation