
Wholesale Electricity Market Submission to Procedure Change Proposal

PC2013-6: Changes to Market Procedure for Certification of Reserve Capacity

Submitted by

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Submission

Clause 2.10.7 of the Wholesale Electricity Market Amending Rules provides that any person may make a submission for a Procedure Change Proposal by filling in this Procedure Change Submission form.

Submissions for Procedure Changes that relate to the Power System Operation Procedures and IMO Market Procedures 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

1. Please provide your views on the Procedure Change Proposal, including any objections or suggested revisions:

Community Electricity is a member of the IMO Procedure Change and Development Working Group.

Community generally supports the Procedure Change Proposal on the grounds that it clarifies, extends and updates the procedure to reflect recent rule changes and thereby enhances the integrity of the WEM.

In response to the call for comment on section 4.3, we suggest in respect of a dual fuel facility, the secondary fuel should be considered as supplementing the availability of the primary fuel and thereby facilitating increased probability of achieving the full output; we consider that the certified quantity should not be limited according to the limitations of the most constrained fuel.

2. Please provide an assessment whether the Procedure Change Proposal is consistent with the Market Objectives and the Wholesale Electricity Market Amending Rules.

Community considers the proposal to be consistent with all the Market Objectives.

3. Please indicate if the Procedure Change Proposal will have any implications for your organisation (for example changes to your IT or business systems) and any costs involved in implementing these changes.

Not applicable

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

Not applicable