

## Wholesale Electricity Market Submission to Procedure Change Proposal

PC\_2012\_07: Changes to Market Procedure for Certification of Reserve Capacity

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### Submitted by

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| <b>Organisation:</b>   | Community Electricity  |
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| <b>Date submitted:</b> | 2 October 2012   |

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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](mailto:market.development@imowa.com.au)

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

Community generally supports the Procedure Change Proposal on the grounds that it updates the existing procedure to properly reflect the various recent changes to the Market Rules.

We suggest reconsideration of the procedure for denying Capacity Credits on the basis of the Outage Assessment (section 3.5). While we fully support the concept of denying capacity certification to a participant that is not meeting sufficient performance standards, we suggest that the procedure should recognise the dramatic commercial impairment that such a denial would cause the participant, together with the potential impact on the market. Without limiting the requirement for compliance, we suggest that prior to the formal, irreversible, denial, the procedure should provide for the IMO to warn the participant of its intention to deny certification, its reasons, and a call for remedy specifying the minimum action required by the participant for certification to be granted.

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**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.

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**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.**

The proposal has no implications for Community.

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

Not Applicable