
Wholesale Electricity Market – Submission to Procedure Change Proposal

Procedure Change: PPCL0021

Replaced PSOPs: Competitive Balancing and Load Following Market 1

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 should be submitted to:

Western Power Networks - System Management Division

Attn: Alistair Butcher, Market Strategic Development Manager
GPO Box L921
Perth WA 6842
Fax: (08) 9427 4228
Email: market.development@westernpower.com.au

Submissions for Procedure Changes that relate to IMO Market Procedures should be submitted to:

Independent Market Operator

Attn: Manager Market Administration
PO Box 7096
Cloisters Square, Perth, WA 6850

Fax: (08) 9254 4399
Email: marketadmin@imowa.com.au

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

LGP is a member of the Rules Development Implementation Working Group and the Power System Operating Procedures Working Group.

— LGP does not support the Change Procedure Proposal for the reasons specified below in Communications and Control Systems part A, and Dispatch part A.

While we would suggest that the two procedures would preferably have been the subject of individual Change Proposals, we comment on them sequentially below.

While we make a number of comments below, we consider that only part A of both sections are material, and we would otherwise support both procedures.

Communications and Control Systems

A) Clause 3.2 states to the effect that all Balancing Facilities excluded from the Balancing Facility Requirements must either possess voice, SMS and e-mail communications or otherwise have an Operational Control Agreement with System Management. While the procedure is otherwise silent on the Operational Control Agreement, clause 4.1 refers to “Participants with Scheduled or Non-Scheduled Generators remotely operated by System Management under an agreement between the Market Participant and System Management [MR 7.8].” Similarly, clause 4.3 refers to “an operating agreement for remote operation and control”.

LGP submits that these provisions need to be clarified and integrated with the New Procedure for Balancing Facility Requirements. In particular, it is unclear whether these provisions refer to a Generator-Control service offered by System Management to Market Generators in general, or whether it is the subject of the reference in clause 2.1.1 of the new Balancing Facilities Requirements procedure. We regret that the ambiguity and lack of detail in this respect renders the proposal incapable of unqualified support.

B) Clause 5.1 provides for the situation in which communication is lost, including Automatic Generator Control. While we support this, we seek clarification that this is in compliance with the Technical Rules, which we understand to require that a Generator is tripped in the event of SCADA being lost for more than 7 seconds.

C) We suggest that the document would benefit from an editorial read-through. For example:

- i) Each material part of the document should have a consistent unique clause number or other identifier; (for example, the nomenclature of page 4 seems to be stand-alone);

- ii) AGC is defined three times;
- iii) Clause 2 of page 5 should be integrated with “Related Documents” of page 4, and the duplication should be removed.

Dispatch

A) Clause 5.4 Significant Discrete Loads has not been finalised or properly discussed, and is potentially onerous for Retailers depending on the definition of “related loads”.

B) We suggest that the confidentiality requirement specified in clause 5.5.6 should be harmonised with the general requirements for confidentiality and not treated as a special case.

C) While LGP supports the intent of clauses 6.1.3 c to f, we perceive that this is an inelegant manner of implementing it.

D) In clause 7.4.4, we seek confirmation that the offered Turn-Down Price has no role to play in this order.

E) We suggest that the procedure would benefit from an editorial read-through.

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

Subject to our reservations stated above in part A of both sections, LGP considers that otherwise the Change Proposal are in harmony with the Rule Change Proposal implementing the New Balancing Market and by extension all the Market Objectives. We consider that our reservations can be remedied by proper definition using the existing processes.

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 potentially has material consequences for LGP, which is why we request proper definition and discussion.

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

Not applicable