
Wholesale Electricity Market – Submission to Procedure Change Proposal

Procedure Change: PPCL0021

Replaced PSOPs: Competitive Balancing and Load Following Market 1

ADDITIONAL

Submitted by

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| Date submitted: | 29.3.12 |

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.

— Communications and Control Systems

LGP welcomes the revision of the original document. However, we regret to advise that we do not support the revised document because clause 2.2 (Balancing Facilities with Special Conditions Imposed) is confusing and ambiguous.

We note that section 2.2.1 references clauses 2.1 and 2.2 of the Market Procedure: Balancing Facility Requirements, which clauses pertain to Balancing Facilities in general. We do not understand the intent of this reference in the section dealing with 'Balancing Facilities subject to Special Conditions'. Further, the clause appears to specify MR 7A.1.8 as the source of the Special Conditions.

Section 2.2.2 then goes on to state that clause 2.2.1 does not apply to any Balancing Facility that is subject to Special Conditions under clause 3.1.1 of the Market Procedure: Balancing Facility Requirements. Clause 3.1.1 also references MR 7A.1.8 as being the source of the Special Conditions.

To add to the confusion, we suggest that the reference MR 7A.1.8 in both Procedures should actually reference MR 7A.1.11.

We suggest that this issue be remedied by succinctly stated the obligations placed on a Balancing Facility upon which Special Conditions have been imposed.

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

As stated above, we do find clause 2.2 to be ambiguous and therefore cannot comment.

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 may have 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
