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## Wholesale Electricity Market – Submission to Procedure Change Proposal

Procedure Change: PPCL0023

Replaced PSOPs: Competitive Balancing and Load Following Market 3

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### Submitted by

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<b>Organisation:</b>	Landfill Gas and Power
<b>Address:</b>	
<b>Date submitted:</b>	20.2.12

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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](mailto: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

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**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 supports the Change Procedure Proposals in respect of the changes to the following PSOPs:

- Commissioning and Testing
- Facility Outages
- Monitoring and Reporting

We generalise advise an editorial read-through of the documents to remove duplication and improve consistency and clarity.

Facility Outages

Clause 2.1 (Participant Contacts) provides that:

“Depending on the circumstances, System Management may communicate directly with participants or request participants to seek resolution amongst themselves.”

We note that it is unclear exactly what is to be resolved and how a participant is to identify a party with which it is to achieve resolution. Furthermore, we suggest that this provision more properly belongs in Clause 6 (Acceptance of Outage Plans)

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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.**

LGP considers that the Change Proposal is in harmony with the Rule Change Proposal implementing the New Balancing Market and by extension 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 will not materially impact LGP.

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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