
Wholesale Electricity Market
Submission to Rule Change Proposal

RC_2013_09: Incentives to Improve Availability of Scheduled Generators

Submitted by

Name:	Andrew Stevens
Phone:	(08) 9261 2835
Fax:	
Email:	Andrew.stevens@bluewatersps.com.au

Organisation:

1. Please provide your views on the proposal, including any objections or suggested revisions.

Minor insertion: 4.26.1D (b) ii

participant to plan any maintenance of significance. There is no value or gain to the generator, only an additional penalty on top of the costs the 3rd party outage causes the participant.

If System Management (SM) require a consequential outage of a generation facility and that network outage is shorter than planned, but the generation unit outage runs longer than that network outage the IMO should consider that at the least, only the overr

outage if possible.

2. Please provide an assessment whether the change will better facilitate the achievement of the Market Objectives.

Bluewaters remains supportive of the overall concepts and the majority of details in the proposed rule changes. Bluewaters believes the proposed rule changes will better facilitate the Objectives of the Market Rules primarily by providing incentives to improve availability and signals (to existing and potential capacity providers) around the likely viability of low-availability plant.

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

Bluewaters does not anticipate any material impact on systems or implementation costs as a result of this rule change.

Some additional monitoring of rates may be required and the practical impact and outcomes of the various margins (eg. Combined forced-planned outage rates, forced outage thresholds etc) is difficult to fully assess (therefore it is difficult to assess any likely behaviour change or the impact of three and five year business and asset management plans for example).

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

Anticipate negligible time required to implement changes or adapt process at this stage.
