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INTRODUCTION

Market Rule 2.5.1 of the Wholesale Electricity Market Rules provides that any person (including the Independent Market Operator) may make a Rule Change Proposal by completing a Rule Change Proposal Form and submit this to the Independent Market Operator (IMO).

The IMO will assess the proposal and, within 5 Business Days of receiving the Rule Change Proposal Form, will notify the proponent whether the Rule Change Proposal

outage notification is required. This will also allow System Management to properly monitor the compliance of Participants with clause 3.21.4. In addition to the proposed Rule Changes, the timing of a notification of a forced outage under Market Rule 3.21.4 will be clarified in the Power System Operation Procedure: Facility Outages. In summary, System Management will require immediate notification by phone (3.21.4), and will require notification via SMMITS within 15 days (3.21.7).

The Proposal and the Market Objectives

System Management submits that the proposed Rule Changes are of a procedural nature, and would promote the economically efficient, safe and reliable production and supply of electricity in the SWIS.

Increasing the time by which System Management must provide information to the IMO would increase the accuracy of the information used to settle the market, thereby reducing the costs to Participants and the long-term cost of electricity.

Further, System Management would be able to pursue investigations and minimise the need for allegations to be made which are not well premised.

System Management submits that an increased time would allow System Management to assist Participants in identifying situations where a forced outage should be submitted. This will in turn increase the overall effectiveness of the Reserve Capacity Mechanism, and may also increase the efficiency of system scheduling, thereby increasing the reliability of the SWIS.

WHETHER THE PROPOSAL WILL BE PROGRESSED FURTHER

System Management requests that this Rule Change Proposal be dealt with in accordance with the Fast Track Rule Change process, on the basis that it satisfies the requirements of clause 2.5.9(a) of the Market Rules, that is, the Rule Change is of a minor or procedural nature. System Management argues that:

- The inclusion of new clause 7.13.1A provides additional time for System Management to provide relevant data to the IMO. Previously System Management was required to provide both Verve Energy's non-compliance MWh quantity and schedules of planned, consequential and forced outages to the IMO on the first business day following the conclusion of the trading day. A procedural change has been proposed which would vary the time for the provision of this data to fifteen business days following the conclusion of the relevant trading day. In all other respects the relevant provisions would remain the same, and will not impact upon any aspect of settlement.
- The proposed inclusion of "..., or as agreed between the IMO and System Management" in clause 7.13.1(c) is procedural in character. This amendment gives statutory certainty to System Management where it has modified the format of dispatch instructions to conform to the IMO's settlement system. It is important to note that the envisaged modifications do 2049(s)-51(a)1.31968(m)-4.4582fio15.6

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- (cB) the maximum daily ambient temperature at the site of each generating system monitored by System Management's SCADA system for the Trading Day;
- (cC) the MWh quantity of non-compliance by the Electricity Generation Corporation by Trading Interval;
- (d) a description of the reasons for each Dispatch Instruction issued, including a flag indicating where a Dispatch Instruction was issued in connection with:
 - i. any Ancillary Service Contract;
 - ii. any Balancing Support Contract;
 - iii. any Network Control Service Contract;
 - iv. any test of equipment allowed under these Market Rules; or
 - v. any failure of an Electricity Generation Corporation Facility to follow the scheduling and dispatch procedures relating to clause 7.6A;
- (dA) The MWh energy dispatched under a Balancing Support Contract for each Trading Interval in the Trading Day by Facility;
- (dB) The MWh energy dispatched under a Network Control Service Contract for each Trading Interval in the Trading Day by Facility;

