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## 1. INTRODUCTION

### **General Information about Rule Changes**

Clause 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 submitting this to the Independent Market Operator (IMO).

In order for the Proposal to be progressed, the change Proposal must explain how it will enable the Market Rules to better contribute to the achievement of the wholesale electricity market objectives. The objectives of the market are:

- (a) to promote the economically efficient, safe and reliable production and supply of electricity and electricity related services in the South West interconnected system
- (b) to encourage competition among generators and retailers in the South West interconnected system, including by facilitating efficient entry of new competitors
- (c) to avoid discrimination in that market against particular energy options and technologies, including sustainable energy options and technologies such as those that make use of renewable resources or that reduce overall greenhouse gas emissions
- (d) to minimise the long-term cost of electricity supplied to customers from the South West interconnected system
- (e) to encourage the taking of measures to manage the amount of electricity used and when it is used

A Rule Change Proposal can be processed using a Standard process or a Fast Track process. The Standard process involves a combined 10 weeks public submission period. Under the shorter Fast Track process the IMO consults with Rule Participants who either advise the IMO that they wish to be consulted or the IMO considers have an interest in the change

### **About this Rule Change**

On 13 September 2007, the IMO submitted a Rule Change Proposal titled Reserve Capacity Testing Payments.

The Proposal is being processed using the Standard Rule Change Process, described in section 2.7 of the Wholesale Electricity Market Rules.

The Standard Process adheres to the following timelines, outlined in section 2.7 of the Market Rules:

- The first Public Submission period is 30 Business Days after the IMO has published the Rule Change Notice for the Proposal
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## Public Domain

- The second Public Submission period is for a minimum of 20 Business Days from the date the Draft Rule Change Report is published.
- Within 20 Business Days after the end of the second Public Submission period, the IMO must publish a Final Rule Change Report.

The key dates in processing this Rule Change Proposal are:

- The Rule Change Notice for this Proposal was published on the IMO website on 17 September 2007
- The first Public Submission period on the Rule Change Proposal ended on 29 October 2007
- This Draft Rule Change Report is published on 26 N

## 2. THE RULE CHANGE PROPOSAL

Energy and non-Verve Energy facilities to be paid MCAP for any energy dispatched as a result of the Reserve Capacity tests.

Since it is not intended for Participants to receive Dispatch Instruction Payments for the energy scheduled during these tests, the IMO proposes to clarify clauses 6.17.6 and 7.13.1 to explicitly exclude Dispatch Instructions from being provided to the IMO if a facility is undergoing a Reserve Capacity test in accordance with section 4.25.

In addition, Participants are paid MCAP for Commissioning tests according to clause 3.21A.14. The IMO therefore also proposes to clarify that Dispatch Instructions are not provided to the IMO if a facility is undergoing a Commissioning Test in accordance with section 3.21A.

In regard to Reserve Capacity testing, the IMO has developed a testing protocol, available on the IMO website, which seeks to minimise the cost of these tests and also minimise the need for separate Reserve Capacity tests to be run by Market Participants. The protocol enables performance to be verified from normal operation, without the need for specific Reserve Capacity tests.

For liquid fuel facilities or facilities that only operate at full capacity for short periods over the year, Reserve Capacity tests may also be run during normal maintenance or operational testing, or at times when liquid fuels are likely to be used to meet normal market operations. This will assist Participants to prove the ability to operate their facilities at their maximum Reserve Capacity Level with minimal additional costs.

### ***Pending Res Proposed by the IMO***

The IMO proposed the following amendments to the Market Rules (added words are underlined>):

- 6.17.6. The Dispatch Instruction Payment,  $DIP(p,d,t)$ , for Market Participant  $p$  and Trading Interval  $t$  of Trading Day  $d$  equals the sum of:
- (a) zero, if Market Participant  $p$ :
    - i is the Electricity Generation Corporation; or
    - ii was issued no Dispatch Instructions or was issued instructions described by either (c) or (d) for the Trading Interval;
  - (b) the sum over all Scheduled Generators and Dispatchable Loads registered by the Market Participant of the following amounts for Trading Interval  $t$ :
    - i. if the Dispatch Schedule for the Registered Facility is set in accordance with clause 6.15.1(a) for Trading Interval  $t$ , the Balancing Support Contract energy dispatched from the Facility in Trading Interval  $t$  as specified by System Management in accordance with clause 7.13(dA) is zero (where for the purpose of this calculation a Loss Factor

adjustment is to be applied to the quantity specified by System Management so that the result is measured at the Reference Node) and the Network Control Service Contract energy dispatched from the Facility in Trading Interval t as specified by System Management in accordance with clause 7.13(dB) is zero (where for the purpose of this calculation a Loss Factor adjustment is to be applied to the quantity specified by System Management so that the result is measured at the Reference Node), the amount for the Registered Facility is zero;

if clauses 3.21A.14 or 4.25.10 apply to the Registered Facility during the Trading Interval, the amount for the Registered Facility is zero;

- 7.13.1. System Management must provide the IMO with the following data for a Trading Day by noon on the first Business Day following the day on which the Trading Day ends:
- (a) the Operational System Load Estimate in each Trading Interval in the Trading Day;
  - (b) Load Forecasts prepared by System Management in accordance with clause 7.2.1(b);
  - (c) a schedule of all of the Dispatch Instructions, other than instructions with respect to Registered Facilities to which clauses 3.21A.14 or 4.25.10 apply, that System Management issued for each Trading Interval in the Trading Day by Market Participant and Facility, including the information specified in clause 7.7.3;

## **he IMO's Initial Assessment of the Proposal**

The IMO decided to proceed with the Proposal on the basis of its preliminary assessment which indicates that the proposal is in the public interest.

### 3. SUBMISSIONS

IMO received submissions from Alinta Sales, Landfill Gas and Power, and Synergy. A summary of all submissions is listed below. Section 4 includes IMO's response to the issues raised. The submissions can be found on the IMO website.

#### ***P* Market Advisory Committee**

The Market Advisory Committee (MAC) was invited to have preliminary discussions on the Proposal at its meeting on 12 September 2007, before it was formally submitted by the IMO.

MAC noted that the current intent of the Rules appears to be that MCAP should be paid for Reserve Capacity tests and that there is a need to clarify inconsistencies in respect to this in the Rules. MAC also agreed that clarifying this will ensure that Verve Energy facilities are treated equally to non Verve Energy facilities in regard to compensation for these tests. While MAC members questioned whether MCAP will cover the full cost of the tests in all circumstances, MAC was in general agreement that the proposal should be put forward in order to clarify the Rules.

At the MAC meeting on 10 October 2007, members were invited to express their view on the formal Proposal. MAC supported the change. No member expressed concerns with the proposed Rule Change.

#### ***P* Alinta Submission**

Alinta agreed that the Rules should be clarified to remove any doubt as to the treatment of facilities undergoing testing. Alinta noted that there are procedures in place to allow facilities to prove compliance with their reserve capacity obligations during normal operations.

Alinta requested clarification whether Dispatch Instruction Payments will be paid to Participants when System Management issues a Dispatch Instruction t

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 **ynergy** *mission*

Synergy supported the IMO's rule change proposal as providing clarity to the Market Rules. Synergy noted that the proposed changes will provide clarity to Participants and potential investors in regard to payments for Reserve Capacity tests.

## 4. THE IMO'S ASSESSMENT AND DECISION



### **Assessment**

4.3.3

No interested party expressed any concern regarding the proposed change. In their submissions, Alinta, Landfill Gas and Power and Synergy expressed their support for the proposal. The IMO therefore considers that the proposed change has the support of the Participants in the Wholesale Electricity Market.

Alinta requested the IMO to clarify whether a facility, attempting to prove its reserve capacity obligation quantity during normal operation, will receive Dispatch Instruction Payments if System Management issues a Dispatch Instruction to the facility to extend its operation, at this output level, beyond the time submitted in the Resource Plan.

The IMO confirms that a Participant will receive Dispatch Instruction Payments when the participant

(c) The IMO considers that the proposed changes do not impact on, and therefore are consistent with the operation of objective (c) of the Market Objectives.

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(d) The IMO considers that the proposed changes do not impact on, and therefore are consistent with, the operation of objective (d) of the Market Objectives.

The IMO considers that the proposed changes do not impact on, and therefore are consistent with, the operation of objective (d) of the Market Objectives.

(e) The IMO considers that the proposed changes do not impact on, and therefore are consistent with, the operation of objective (e) of the Market Objectives.

The IMO considers that the proposed changes do not impact on, and therefore are consistent with, the operation of objective (e) of the Market Objectives.

In accordance with Clause 2.4.3(b) of the Market Rules, in deciding whether or not to make Amending Rules, the IMO must also have regard to the practicality and cost of

## 5. CALL FOR SUBMISSIONS

## 6. PROPOSED AMENDING RULES

The following clauses will be amended as follows (~~deleted wording~~, new wording):

**C se**

- 6.17.6. The Dispatch Instruction Payment,  $DIP(p,d,t)$ , for Market Participant  $p$  and Trading Interval  $t$  of Trading Day  $d$  equals the sum

**C se p**

- 7.13.1. System Management must provide the IMO with the following data for a Trading Day by noon on the first Business Day following the day on which the Trading Day ends:
- (a) the Operational System Load Estimate in each Trading Interval in the Trading Day;
  - (b) Load Forecasts prepared by System Management in accordance with clause 7.2.1(b);
  - (c) a schedule of all of the Dispatch Instructions, other than instructions with respect to Registered Facilities to which clauses 3.21A.14 or 4.25.10 apply, that System Management issued for each Trading Interval in the Trading Day by Market Participant and Facility, including the information specified in clause 7.7.3;