
Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2009_08 – Update to Commissioning Provisions

Submitted by

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Date submitted:	09-06-09

Submission

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

Griffin supports the intent of this rule change – that is to allow generators to commission their facilities without being subject to strict energy market deviation and non-compliance penalties. This is a sensible way of allowing a new, untested facility to enter an energy market.

The need for this rule change has only come about through the adoption of a previous rule change, which inadvertently led to a late commissioning facility being required to submit a resource plan while undergoing commissioning. The objective of RC_2008_17 (amongst other things) was to disallow a late commissioning facility from using the commissioning process to escape capacity credit refunds. The inclusion in RC_2008_17 of clause 3.21A.7A, coupled with the seemingly innocuous changing of the term '*commissioning*' to '*Commissioning Test*' in clause 6.5.1A had the effect of introducing the perverse outcome. In other words, the letter of the rules no longer reflected the intent of the rules – leading to the potential for a late commissioning facility to suffer significant financial loss. Griffin suggests that this anomaly could be deemed a manifest error and that RC_2009_08 should have been progressed via the fast track process in order to limit any potential and unintended losses to market participants.

While supporting the intent, Griffin believes that the current RC_2009_08 proposal is flawed. It introduces a new concept through the addition of clause 4.26.1A(a)v, where it appears that late commissioning facilities are deemed to not provide any capacity to the market throughout their Commissioning Test. The term Commissioning Test is ambiguous in that it might refer to a specific event within the commissioning process (e.g. a load rejection test, or a sculptured event); or it may

