



**Wholesale Electricity Market
Rule Change Proposal Submission Form**

RC_2010_10 Bilateral Submission Window



Change Proposal

Verve Energy has proposed to change the Market Rules to include the Bilateral Contract submissions window in the list of processes that the IMO may extend the timelines for, when a computer related failure impacts on the ability of the IMO to run the processes to the strict timeline stipulated in the Market Rules.

Perth Energy's Views

Perth Energy supports Verve Energy's proposal. Having an unnecessary delay between the close of the Bilateral Contract submission window and the opening of the STEM submission window could lead to sub optimal outcomes as opportunities to fine tune Bilateral Contract positions to reflect the most recent, and best available, information may be foregone. Perth Energy supports this Rule Change Proposal being expedited as quickly as the Standard Rule Change Process allows, to ensure that the IMO has the same flexibility to manage the Bilateral Submission Window as currently exists within the STEM, balancing and fuel submission processes.

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

Perth Energy considers the change would better facilitate the achievement of Market Objective¹ (a) as it would encourage further optimisation of bilateral contractual positions, which should have a positive impact on economic efficiency. Perth Energy has not identified any negative impacts on any of the other Market Objectives.

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.

There will be no impact for Perth Energy.

¹ The objective of the market is to ensure that the market is operated in a way that is consistent with the economic objectives of the market, including the promotion of economic efficiency, and the achievement of the market objectives.



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

Perth Energy does not require any lead time to implement the change.