
Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2010_29 Curtailable Loads and Demand Side Programmes

Submitted by

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Submission

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

Summary T8 12(oposal0)Tj3(. (A66 s aed)-4.c29.2()-722732000)5134-16.065 -1.1

- Changing the manner in which Relevant Demand is measured for Curtailable Loads and/or Demand Side Programmes to use their Individual Reserve Capacity Requirement (IRCR), rather than the 32 Peak Trading Intervals as is currently the case, entrenches the existing 'static' baseline for measuring the extent to which Curtailable Loads and/or Demand Side Programmes meet their obligations under the Market Rules.

There appeared to be general consensus at a workshop held by the IMO on 8 April 2011 that adopting a 'dynamic' baseline to measuring the extent to which Curtailable Loads

- There may be an unintended misalignment between the 10 Business Day delay in the IMO associating a load with a DSP under clause 2.29.5E and a further 10 Business Day delay in resetting the Relevant Demand in clause 2.29.5H after a load is associated with the DSP. Alinta is concerned that the delay in resetting the Relevant Demand by 10 Business Days after the load is associated with the DSP has the potential to create issues if the DSP were dispatched within this period. It appears that the resetting of the Relevant Demand should be occurring in the original 10 Business Days allowed for the IMO to associate the load with the DSP.
- It appears that the deletion of clause 2.33.4(d)(iii) would mean that a Demand Side Programme (DSP) may only be deregistered with six months notice, whereas currently a Curtailable Load, which may comprise the entire programme, can be deregistered with one month notice.
- Currently, Intermittent Loads are not permitted to be included in demand side programmes, but if clause 4.8.3(a) were deleted as proposed, this would no longer be the case.
- Clause 4.8.3(e) currently requires that loads comprising the demand side programme have the same availability as the block that is applied for (e.g. 24 hours or 48 hours). This appears not to have been covered in the amended Market Rules or in the new procedure.
- The reasons that clause 4.11.4, which specifies the hours of availability, is being deleted is unclear.
- The reference in clause to 4.25.1(c) to a DSP operating at its maximum Reserve Capacity Obligation Quantity is unclear, as this quantity is simply the difference between its Relevant Demand and its Required Level (i.e. should it be operating at its Relevant Demand?).
- Clause 4.25.2(a) contains a reference to “Meter Schedules” which should instead be a reference to “sent out energy non loss adjusted”.
- It appears that clause 4.25.3B assumes that the “activation” of the DSP would be for the complete amount of capacity offered by the DSP. Alinta understands it is possible, although perhaps unlikely, that a DSP might only be partially “activated”. In such circumstances, it appears that the second Reserve Capacity test would still be required.
- The reference to “current scheduling day” in clause 4.25.4 is unclear and must be more specific. For example, “...on the Second Trading Day following the day on which the

- Alinta considers that the drafting of clauses 4.26.2CA and 4.26.2CB could be improved.
- Alinta notes that clause 4.26.2D(iii) currently results in a level of refunds that is greater than capacity credits assigned ($-2 * \text{meter data} + \text{Capacity Credits} - \text{Relevant Demand}$). This error should be corrected.
- The new clause 4.26.3A(b)(ii) appears to add MW to \$?
- In respect of clause 6.12.1(h), Alinta notes that loads and Demand Side Programmes do not have “sent out capacity”.
- Clause 6.17.6(d)(i)(2) appears to incorrectly refer to clause 7.1.13(eC) rather than clause 7.13.1(eC). It also appears that this clause will conflict with changes to clause 6.17.6.(d)(i) following RC_2008_20, which commences on 1 October 2011 and changes the dispatch quantity.

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