

Draft Rule Change Report Title: Cost_LR

Ref: RC_2010_33
Standard Rule Change Process

Date: 2 March 2011

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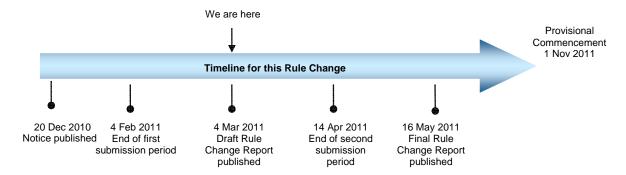
1. INTRODUCTION

On 17 December 2010 Verve Energy submitted a Rule Change Proposal regarding amendments to clauses 9.9.1, 9.11.1 and new clause 9.9.3A of the Wholesale Electricity Market Rules (Market Rules).

This proposal is being processed using the Standard Rule Change Process, described in section 2.7 of the Market Rules. The standard process adheres to the following timelines:



The key dates in processing this Rule Change Proposal are:



Please note the commencement date is provisional and may be subject to change in the Final Rule Change Report.

The draft decision of the IMO Chief Executive Officer is to accept the Rule Change Proposal as proposed and modified following the first submission period. The detailed reasons for the decision are set out in section 5 of this report.

In making its draft decision on the Rule Change Proposal, the IMO has taken into account:

- x the Wholesale Market Objectives;
- x the practicality and cost of implementing the proposal;
- x the views of the Market Advisory Committee (MAC); and
- x the submissions received.

All documents related to this Rule Change Proposal can be found on the IMO website: http://www.imowa.com.au/RC_2010_33.

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2 CALL FOR SECOND ROUND SUBMISSIONS

The IMO invites interested stakeholders to make submissions on this Draft Rule Change Report. The submission period is 28 Business Days from the publication date of this report. Submissions must be delivered to the IMO by 5.00pm, **Thursday 14 April 2011**.

The IMO prefers to receive submissions by email (using the submission form available on the IMO website: http://www.imowa.com.au/rule-changes) to: market.development@imowa.com.au

Submissions may also be sent to the IMO by fax or post, addressed to:

Independent Market Operator

Attn: General Manager, Development PO Box 7096 Cloisters Square, PERTH, WA 6850

Fax: (08) 9254 4399

3. THE RULE CHANGE PROPOSAL

3.1 Submission Details

| Name: | Andrew Everett |
|--------|----------------|
| Phone: | 9424 1836 |
| Fax: | 9424 1818 |

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Verve Energy noted that under the current settlement rules any third party suppliers of System Restart Services will be paid in accordance with the terms of their contracts. These payments are then deducted from the total determined by the ERA. In the event

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Perth Energy also supports a further development of the Ancillary Services market to introduce more meaningful competition for these services. In this regard, Perth Energy welcomes the recent presentation to the MAC by System Management about the competitive provision of Ancillary Services, and looks forward to participating in any development work that may be required to move towards competitive provision of Ancillary Services.

Synergy considers that any System Restart cost should fall on customers, as they are the ultimate beneficiaries of the network having access to a System Restart capability. Synergy agrees that payment to third party suppliers should therefore be recovered from Market Customers through the Reconciliation Settlement amount. Synergy also notes that while the current System Restart value is zero, Verve Energy is the only provider of System Restart under a contractual arrangement put in place prior to market start. However, Synergy notes that this arrangement will expire on 30 June 2011.

Perth Energy considers that the proposed changes would have a beneficial impact on Wholesale Market Objective (a). LGP and Synergy agree with Verve Energy that the proposed changes are consistent with the Wholesale Market Objectives.

No issues were raised in the submissions.

4.2 Public Forums and Workshops

No public forums or workshops were held in relation to this Rule Change Proposal.

4.3 Additional Amendments to the Amending Rules

Following the first public submission period the IMO has made some additional changes to the proposed Amending Rules. A summary of these changes is provided below. The additional amendments are contained in Appendix 3 of this report.

It should be noted that, with the exception of the changes originally proposed by Verve Energy, the intention of the following amendments is only to provide clarification of existing processes, or to address minor typographical and manifest errors in the current Market Rules. The additional amendments do not involve any changes to the current settlement processes.

Calculation of ASP Balance Payment

Verve Energy has proposed the replacement of the term "Sum(i •I,ASP_Payment(i,m))" with a new term "Sum(i •I,ASP_Balance_Payment(i,m))" in the Electricity Generation Corporation AS Provider Payment calculation in clause 9.9.1. The new term is intended to be the sum of:

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calculated under clause 9.9.3A(c) may not equal (b) above. For example, if Cost_LR was \$1000 and there was one ASC payment for System Restart Service of \$300, no ASC payments for Load Rejection Reserve Service and 10 providers of Ancillary Services, then the sum of the clause 9.9.3A(c) values for the 10 providers would be $10 * \max(0, 1000 - 300) = \7000 , not the desired \$300. In general, it is not possible to tell whether the sum of the ASC payments for System Restart Service and Load Rejection Reserve Service exceeds Cost_LR by considering one provider at a time, as there may be multiple providers of System Restart Service and Load Rejection Reserve Service under ASCs.

The IMO has amended the proposed drafting so that clause 9.9.3A defines a total figure across all ASCs ("ASP_Balance_Payment(m)"), which is calculated as described above and used in clause 9.9.1 instead of "Sum(i •I,ASP_Balance_Payment(i,m))".

Contracted Ancillary Services

An ASC can cover the provision of multiple Ancillary Services, which can be of the same or of different Ancillary Service types. A Rule Participant may also provide a particular

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Clause 2.4.2 outlines that the IMO "must not make Amending Rules unless it is satisfied that the Market Rules, as proposed to be am $\,$

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The IMO considers that the proposed Amending Rules will promote the economically efficient supply of electricity and electricity related services in the SWIS. The proposed

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The MAC supported the progression of the proposal through the rule change process, subject to Mr Everett's review of the drafting and the incorporation of any further necessary amendments.

5.4 Views Expressed in Submissions

The IMO received three submissions during the first submission period, all supporting the Rule Change Proposal. No issues were raised in the submissions.

6. THE IMO'S DRAFT DECISION

The IMO's draft decision is to accept the Rule Change Proposal as modified by the amendments outlined in section 4.3 and specified in Appendix 3 of this report.

6.1 Reasons for the decision

The IMO has made its decision on the basis that the Amending Rules:

- x will allow the Market Rules to better address Wholesale Market Objective (a);
- x are consistent with the remaining Wholesale Market Objectives;
- x improve the integrity of the Market Rules;
- x have the support of the MAC; and
- x are supported by all the submissions received during the first submission period.

Additional detail outlining the analysis behind the IMO's reasons is outlined in section 5 of this Draft Rule Change Report.

7. PROPOSED AMENDING RULES

The IMO proposes to implement the following Amending Rules (<u>added text</u>, deleted text):

Clauses 3.22.2 and 3.22.3 have been amended to clarify that if an ASC covers multiple Ancillary Services then System Management will provide details for each of the contracted Ancillary Services, rather than for the ASC as a whole. Clause 3.22.3(b)(ii) has been updated to be more specific about the units of measure used for each Ancillary Service type.

- 3.22.2. When System Management has entered into an Ancillary Service Contract with a Rule Participant, System Management must as soon as practicable and not less than 20 Business Days prior to the Ancillary Service Contract taking effect, provide the IMO with:
 - (a) the identity of the Rule Participant, and
 - (b) <u>for each Contracted Ancillary Service</u> the Ancillary Service contracted to be provided by the Rule Participant <u>under the Ancillary Service</u> Contract:
 - a unique identifier for the Contracted Ancillary Service;
 - ii. the type of Ancillary Service where this can be one of:
 - 1. Spinning Reserve Service:

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- 2. Load Following Service;
- 3. Load Rejection Reserve Service;
- 4. System Restart Service; or
- Dispatch Support Service; and
- the form of settlement data that System Management will provide to the IMO for the Contracted Ancillary Service provided by the Rule Participant, where this data must be one of the formats allowed by clause 3.22.3.
- (c) a unique identifier for the Ancillary Service Contract;
- (d) the form of settlement data that System Management will provide to the IMO for the Contracted Ancillary Service provided by the Rule Participant, where this data must be one of the formats allowed by clause 3.22.3.
- 3.22.3. System Management must provide the following information to the IMO for each Rule Participant holding an Ancillary Service Contract for a Trading Month by the date specified in clause 9.16.2(a):
 - (a) the identity of the Rule Participant;
 - (b) for each <u>Contracted Ancillary Service provided under an Ancillary</u> Service Contract held <u>by the Rule Participant</u>:
 - i. the type of Ancillary Service where this can be one of:
 - 1. Spinning Reserve Service;
 - 2. Load Following Service;
 - 3. Load Rejection Reserve Service;
 - 4. System Restart Service; or

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- 1. a total monthly payment for the Ancillary Service in dollars and whole cents; or
- 2. a price in dollars and whole cents per unit of the quantity described in (ii) per Trading Interval.

A new term ASP_Balance_Payment(m) has been introduced, replacing the existing term

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```
Reserve_Cost_Share(p,m) =
0.5 × (Margin_Peak(m) × Sum(d • D,t • Peak,MCAP(d,t)
× Reserve_Share(p,t)
× (Capacity_R_Peak(m) - Sum(i • I,ASP_SRQ(i,t)
c • CAS_SR,ASP_SRQ(c,t)) - 0.5 × LFR(m))))
```

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Interval t, where this is to be determined by the IMO using the methodology described in clause 3.14.2;

Margin_Peak(m) is the reserve availability payment margin applying for Peak Trading Intervals for Trading Month m as specified by the IMO under clause 3.22.1(c);

Margin_Off-Peak(m) is the reserve availability payment margin applying for Off-Peak Trading Inte

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System Restart Service, and Dispatch Support Services except those provided through clause 3.11.8B, and

each of the terms ASP_SRPayment(c,m), ASP_LFPayment(c,m), ASP_LRPayment(c,m), ASP_BSPayment(c,m) and ASP_DSPayment(c,m) is determined in accordance with clause 9.9.4.

A new clause 9.9.3B is added to determine the shortfall in the event that Cost_LR(m) is insufficient to cover the Ancillary Service Contract payments for Load Rejection Reserve Service and System Restart Service. This amount will be recovered by the IMO from Market Customers through the Reconciliation Settlement Amount defined in clause 9.11.1.

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- (a) the applicable monthly dollar value specified by System Management for that Trading Month in accordance with clause 3.22.3(b)(iii)(1); or, if no such value is specified,
- (b) where no value is specified under clause 9.9.4(a), the product of the applicable price specified in clause 3.22.3(b)(iii)(2) for that Trading Month and the sum over Trading Intervals in that Trading Month of the applicable quantities specified in clause 3.22.3(b)(ii).

Clause 9.10A.1 has been updated to clarify that NCC(p,m) is a monthly value, remove the superfluous index for Trading Day and correct the clause reference for the non-compliance quantity NCQ.

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9.11.1. The Reconciliation Settlement amount for Market Participant p for Trading Month m is:

```
RSA(p,m) = (-1) \times Consumption\_Share(p,m) \times \\ \underline{(Sum(q \cdot P, d \cdot D, t \cdot T, BSA(q, d, t)))} \\ + \underline{Sum(q \cdot P, NCC(q, m))} \\ + \underline{Cost\_LR\_Shortfall(m))}
```

Where

Consumption_Share(p,m) is the proportion of consumption associated with Market Participant p for Trading Month m determined by the IMO in accordance with clause 9.3.7;

BSA(q,d,t) is the Balancing Settlement Amount for Market Participant q for Trading Day d and Trading Interval t;

NCC(q,m) is the Non-Compliance Charge settlement amount for Market Participant q for Trading Month m;

Cost LR Shortfall(m) is determined in accordance with clause 9.9.3B;

. . .

Glossary

<u>Contracted Ancillary Service:</u> an Ancillary Service provided by a Rule Participant under an Ancillary Service Contract.

<u>Contracted Dispatch Support Service:</u> a Dispatch Support Service provided by a Rule Participant under an Ancillary Service Contract.

<u>Contracted Load Following Service:</u> a Load Following Service provided by a Rule Participant under an Ancillary Service Contract.

<u>Contracted Load Rejection Reserve Service:</u> a Load Rejection Reserve Service provided by a Rule Participant under an Ancillary Service Contract.

Contracted Spinning Reserve Service: a Spinning Reserve Service provided by a

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APPENDIX 1: FULL DETAILS OF THE PROPOSAL

Background

Verve Energy noted in its Rule Change Proposal that Ancillary Services are used to guarantee the safe, secure and reliable production of electricity on the South West interconnected system (SWIS) by ensuring the system can adequately respond to real time changes in load and generation under a range of scenarios. Ancillary Services are used to control key technical characteristics of the power system such as frequency and voltage. In particular Ancillary Services:

- x help maintain Power System Security (ability of SWIS to deliver energy within reliability standards);
- x help maintain Power System Reliability (ability of the SWIS to withstand sudden disturbances including restoration in the case of blackout);
- x facilitate orderly trading in electricity; and
- x ensure that electricity supplies are of acceptable quality.

Ancillary Services are required to support the Wholesale Electricity market (WEM) but are not traded as part of the WEM. Verve Energy noted that System Management is required to procure adequate quantities of these services, either from the Electricity Generation Corporation (Verve Energy) resources (the default option) or on a contestable basis from independent providers (if they provide a lower cost option to Verve's facilities).

System Management will budget the cost of procuring Ancillary Services, with budgeted costs approved by the Economic Regulation Authority. However, System Management will not fund Ancillary Services. Rather, the IMO recovers the costs of the Ancillary Services from Market Participants through the WEM settlement systems, and will use the revenue received to fund Ancillary Services provided by Verve Energy and any contracted Ancillary Service providers.

In the current market design Verve Energy is the default Ancillary Service provider. System Management is however able to contract with other suppliers for any of the Ancillary Services. The settlement system is designed on this basis:

- x The total cost of an Ancillary Service is:
 - o Proposed by the IMO or System Management; and
 - Determined by the Economic Regulation Authority (ERA) (the ERA could approve the proposal or it could amend the total cost based on its own processes).
- x Verve Energy compensation is then determined as the balance from the total after deducting the total payment to other suppliers of Ancillary Services.

In the case of System Restart, the total is proposed by System Management once every three years for the ERA to determine, though there is a provision for System Management to propose a revised total amount for years 2 and 3 of the 3-year review period. These revised totals are also subject to determination by the ERA.

Issue

Verve Energy noted that under the current settlement rules any third party suppliers for System Restart will be paid as set out in their contracts. These payments will then be

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deducted from the total determined by the ERA, In the event that, for whatever reason, the ERA sets the System Restart cost to be zero, this will currently give rise to a negative amount to be paid to Verve Energy. Effectively, that will mean that Verve Energy will be charged - actually paying the third party suppliers to supply the System Restart service. On top of making this payment Verve Energy will also be required to provide any further System Restart service in addition to the third party suppliers, as required by System Management under clause 3.11.7A, with no compensation.

Proposal

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APPENDIX 2: PROPOSED AMENDING RULES IN THE RULE CHANGE PROPOSAL

Verve Energy proposed the following amendments to the Market Rules in its Rule Change Proposal (deleted text, <u>added text</u>):

A new term ASP_Balance_Payment(i,m) has been introduced replacing the existing term ASP_Payment (i,m) in the definition for Electricity Generation Corporation AS Provider Payment(p,m). Note that ASP_Payment(i,m) continues to be used in the formula. The new term ASP_Balance_Payment(i,m) is determined in a new clause 9.9.3A

9.9.1. The Ancillary Service settlement amount for Market Participant p for Trading Month m is:

ASSA(p,m) = Electricity Generation Corporation AS Provider Payment(p,m)

- $+ d(p,i) \times ASP_Payment(i,m)$
- Load_Following_Share(p,m)
- x (Capacity_LF(m) + Availability_Cost_LF(m))
- Reserve_Cost_Share(p,m)
- Consumption_Share(p,m) x Cost_LRD(m)

Where

the Electricity Generation Corporation AS Provider Payment(p,m) = 0 if Market Participant p is not the Electricity Generation Corporation and

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(c) for Ancillary Service Contracts for Load Rejection Reserve Service and System Restart:

Max(0, Cost_LR(m) - sum(i }, ASP_LRPayment(i,m)) - sum(i }, ASP_BSPayment(i,m))); and

(d) the sum over all Ancillary Service Contracts for Dispatch Support of ASP_DSPayment(i,m), the payment under that contract

Where

each of the terms ASP_SRPayment(i,m), ASP_LFPayment(i,m), ASP_LRPayment(i,m), ASP_BSPayment(i,m) and ASP_DSPayment(i,m) is determined in accordance with clause 9.9.4 and

Cost_LR(m) is the total Load Rejection Reserve Service and System Restart services payment costs for Trading Month m as specified by the IMO under clause 3.22.1(g)(i)

Having made the Load Rejection Reserve Service and System Restart payment to Electricity Generation Corporation non-negative, if the total amount determined by the Economic Regulation Authority is zero, the IMO will be short after paying the third party suppliers. The amendment to clause 9.11.1 is to recover this payment to third party suppliers from Market Customers through the Reconciliation Settlement Amount. Market Customers are not charged a second time in this process as with Cost_LR having a zero amount for Load Rejection Reserve Service and System Restart these services are not charged in clause 9.9.1.

9.11.1. The Reconciliation Settlement amount for Market Participant p for Trading Month m is:

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APPENDIX 3: ADDITIONAL AMENDMENTS MADE BY THE IMO FOLLOWING THE FIRST SUBMISSION PERIOD

The IMO has made some amendments to the Amending Rules following its assessment of the first submission period responses. These changes are as follows (deleted text, added text):

Clauses 3.22.2 and 3.22.3 have been amended to clarify that if an ASC covers multiple Ancillary Services then System Management will provide details for each of the contracted Ancillary Services, rather than for the ASC as a whole. Clause 3.22.3(b)(ii) has been updated to be more specific about the units of measure used for each Ancillary Service type.

- 3.22.2. When System Management has entered into an Ancillary Service Contract with a Rule Participant, System Management must as soon as practicable and not less than 20 Business Days prior to the Ancillary Service Contract taking effect, provide the IMO with:
 - (a) the identity of the Rule Participant; and
 - (b) <u>for each Contracted Ancillary Service</u> the Ancillary Service contracted to be provided by the Rule Participant <u>under the Ancillary Service</u> Contract:
 - a unique identifier for the Contracted Ancillary Service;
 - ii. the type of Ancillary Service where this can be one of:
 - Spinning Reserve Service;
 - 2. Load Following Service;
 - 3. Load Rejection Reserve Service;
 - 4. System Restart Service; or
 - 5. Dispatch Support Service; and
 - the form of settlement data that System Management will provide to the IMO for the Contracted Ancillary Service provided by the Rule Participant, where this data must be one of the formats allowed by clause 3.22.3.
 - (c) a unique identifier for the Ancillary Service Contract;
 - (d) the form of settlement data that System Management will provide to the IMO for the Contracted Ancillary Service provided by the Rule Participant, where this data must be one of the formats allowed by clause 3,22,3.
- 3.22.3. System Management must provide the following information to the IMO for each Rule Participant holding an Ancillary Service Contract for a Trading Month by the date specified in clause 9.16.2(a):
 - (a) the identity of the Rule Participant;

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- Reserve_Cost_Share(p,m)
- Consumption_Share(p,m) × Cost_LRD(m)

Where

the Electricity Generation Corporation AS Provider Payment(p,m) = 0 if Market Participant p is not the Electricity Generation Corporation and

(Availability_Cost_R(m) + Availability_Cost_LF(m) + Cost_LRD(m))
- Sum(i •I, ASP_Balance_Payment(i,m))

ASP Balance Payment(m) otherwise-;

d(p,i) is 1 if ASP i corresponds to Market Participant p and zero otherwise;

ASP_Payment(ip,m) is the total payment to Market Participant p for Contracted Ancillary Services in Trading Month m, determined in accordance with clause 9.9.3:

ASP_Balance_Payment(i-m) is determined in accordance with clause 9.9.3A for Trading Month m;

Load_Following_Share(p,m) is the share of the Cost_LF(m) allocated to Market Participant p in Trading Month m, where this is to be determined by the IMO using the methodology described in clause 3.14.1;

Reserve_Cost_Share(p,m) is defined in clause 9.9.2(b);

Consumption_Share(p,m) is the proportion of consumption associated with Market Participant p for Trading Month m determined by the IMO in accordance with clause 9.3.7;

Capacity_LF(m) is the total Load Following service-Service capacity payment cost for Trading Month m as specified by the IMO under clause 3.22.1(a);

Availability_Cost_R(m) is the total Spinning Reserve <u>Service</u> availability payment costs, excluding Load Following costs, for Trading Month m, as calculated under clause 9.9.2(c);

Availability_Cost_LF(m) is the <u>total</u> Load Following <u>Service</u> availability payment costs for Trading Month m, as calculated under clause 9.9.2(d); and

Cost_LRD(m) is the total Load Rejection Reserve <u>Service</u>, System Restart <u>Service</u>, and Dispatch Support <u>Service</u> services payment costs for Trading Month m as specified by the IMO under clause 3.22.1(g).

Clause 9.9.1A has been updated to correct the invalid formula.

9.9.1A. The Ancillary Service settlement amount for Trading Month m for Rule Participant k-i where Rule Participant k-i where Rule Participant i is not a Market Participant is

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d(k,i) × ASP_Payment(i,m) where d(k,i) = 1 if ASP i corresponds to Rule Participant k and zero otherwise and ASP_Payment(i,m) is ASP Payment(i,m), determined in accordance with clause 9.9.3.

Clause 9.9.2 has been updated to use terminology consistent with clauses 3.22.3, 9.9.3 and 9.9.4, and to address several minor and typographical issues.

- 9.9.2. The following terms related relate to Ancillary Service availability costs:
 - (a) the total availability cost for Trading Month m:

(b) the Spinning Reserve Cost Share cost share for Market Participant p, which is a Market Generator, for Trading Month m:

```
Reserve_Cost_Share(p,m) =

0.5 × (Margin_Peak(m) × Sum(d • D,t • Peak,MCAP(d,t)

× Reserve_Share(p,t)

× (Capacity_R_Peak(m) – Sum(i • I,ASP_SRQ(i,t)

c • CAS_SR,ASP_SRQ(c,t)) - 0.5 × LFR(m))))

+ 0.5 × (Margin_Off-Peak(m) × Sum(d • D,t • Off-Peak,MCAP(d,t)

× Reserve_Share(p,t)

× (Capacity_R_Off-Peak(m) – Sum(i • I,ASP_SRQ(i,t)

c • CAS_SR,ASP_SRQ(c,t)) - 0.5 × LFR(m))))

+ Sum(t • Peak and Off_Peak_T, Reserve_Share(p,t)

× Sum(i • I,ASP_SRPayment(i,m)

c • CAS_SR,ASP_SRPayment(c,m) / TITM))
```

(c) the total Spinning Reserve Availability Cost availability cost for Trading Month m:

```
Availability_Cost_R(m) = Sum(p
```

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MCAP(d,t) has the meaning given in clause 9.8.1and=0 if MCAP
(d,t)<0MCAP(t) is the greater of zero and the Marginal Cost
Administered Price for Trading Interval t calculated in accordance with clause 6.14.2;

Peak denotes the set of Trading Intervals occurring during Peak
Trading Intervals, where "t" refers to a Trading Interval during a Trading
Day; is the set of Peak Trading Intervals in Trading Month m; and

Off-Peak denotes the set of Trading Intervals occurring during Off-Peak Trading Intervals, where "t" refers to a Trading Interval during a Trading Day; and is the set of Off-Peak Trading Intervals in Trading Month m.

D denotes the set of Trading Days within Trading Month m, where "d" is used to refer to a member of that set.

Clause 9.9.3 has been updated to use terminology consistent with clause 9.9.4 and to apply to all Rule Participants with Ancillary Service Contracts, not just Ancillary Service Providers.

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9.9.3A. The value of ASP_Balance_Payment(i,m) for Ancillary Service Provider i in

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CAS_LR is the set of Contracted Load Rejection Reserve Services;

CAS_BS is the set of Contracted System Restart Services;

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ASP_LRPayment(ic,m) for Load Rejection Reserve Service,
ASP_BSPayment(ic,m) for System Restart Service and or

ASP_DSPayment(ic,m) for Dispatch Support Service, as applicable, are for

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suppliers. The amendment to clause 9.11.1 is to recover this payment to third party suppliers from Market Customers through the Reconciliation Settlement Amount. Market Customers are not charged a second time in this process as with Cost_LR having a zero amount for Load Rejection Reserve Service and System Restart these services are not

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<u>Contracted Spinning Reserve Service:</u> a Spinning Reserve Service provided by a Rule Participant under an Ancillary Service Contract.

<u>Contracted System Restart Service</u>: a System Restart Service provided by a Rule Participant under an Ancillary Service Contract.

Dispatch Support Service: Has the meaning given in clause 3.9.9.

Spinning Reserve Service: Has the meaning given in clause 3.9.2.

System Restart Service: The Ancillary Service described Has the meaning given in clause 3.9.8.

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