



The Market Rules currently allows for extensions to the timelines for both consultation and decision making in relation to Rule Changes (clause 2.5.10).

The IMO submitted Rule Change Proposal RC_2011_12 “Extensions to Procedure Change Process Timelines” on 24 October 2011.

The IMO has proposed to amend the Market Rules to explicitly allow the IMO to extend the timeframes for consultation and decision making in relation to Procedure Changes by inserting new clauses 2.10.17 – 2.10.19. The proposed amendments of the Market Rules require the IMO to publish reasons for any extensions to the timelines of the process.

The IMO decided to progress the Change Proposal according to the Fast Track process considering it to be of a procedural nature.

Perth Energy supports the IMO’s Rule Change Proposal.

Firstly, the proposed changes will remove the current inflexibility in the Market Rules in relation to consultation and decision timelines for Procedure Changes. Perth Energy considers the current inability to extend consultation and decision timelines for procedure changes could lead to inadequate consultation and consideration for complex procedure changes.

Secondly, the proposed changes would bring the process for Procedure Change Proposals in line with the process for Rule Change Proposals.

Perth Energy considers the Rule Change Proposal would remove a current inefficiency in the procedure change process and therefore have the potential to positively impact on the achievement of Market Objective¹ (a). Perth Energy has not identified any detrimental impacts on the remaining Market Objectives.

¹ 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-

