

RC_2012_12 Updates to Commissioning Test Plans

Submitted by

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Submission

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

Community Electricity supports the Rule Change Proposal on the grounds that it removes provisions within the Market Rules that require participants to serve the rules rather than the rules serving the market. In general, the Market Rules should establish a framework within which System Management and Market Participants are required to cooperate as reasonable and prudent persons and optimise commissioning requirements having proper regard to the technical and commercial needs of the participant and the consequential costs and risks born by other participants and the market generally. Retention of an obligation to serve the rules as an end in itself is also inefficient and adds unnecessary expense. From this perspective, we welcome the reduction of the 20 day notice period to 7 days and the additional flexibility for System Management to approve lesser periods where it reasonably can, and to withdraw prior approvals where system conditions require it to.

We further support the principle that civil penalties should be used only to enforce material provisions of the Market Ru0006m Onth2. Please provide an assessment, whether the change will better

achievement of the Market Objectives

Community considers that the Rule Changes improve achievement of Market Objectives (a) (to promote the economically efficient, safe and reliable production and supply of

electricity and (d) (to minimise the long-term cost of electricity). We also consider them to be consistent with the other objectives.

3. 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

Not applicable

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

Not applicable
