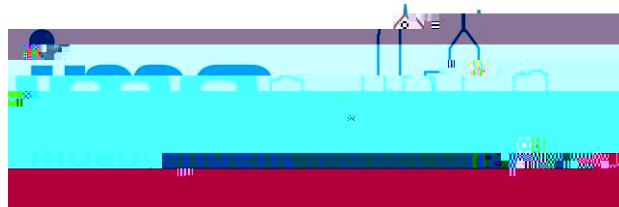


understanding that this change would be implemented via the proposed amendments to 3.21A.13 allowing participants to request a “revised” rather than a “new” Commissioning Test Plan. Perth Energy notes that the proposal does not contain any guidance as to whether the participant requesting a revision should apply for such a revision within a prescribed time period and also the time period that System Management should be allowed to consider such an application. Perth Energy considers 3.21A.13 could be further improved by specifically stating that an application for a revision of an existing Commissioning Test Plan should be made no later than 10 Business Days following the expiry of the original



Energy suggests the following alternative wording to clause 3.21A.10(a)(ii) and 3.21A.10(a)(iii):

- (ii) System Management and the Market Participant must use their best endeavours to agree to an alternative Commissioning Test Plan; and
- (iii) where System Management and the Market Participant agree an alternative Commissioning Test Plan under clause 3.21A.10(a)(ii) the Market Participant must, as soon as practicable, submit that revised Commissioning Test Plan to System Management and System Management must approve that revised Commissioning Test Plan.

Finally, in relation to clause 3.21A.11 Perth Energy suggests to specifically stipulate a timeframe that System Management must adhere to in relation to giving notice about its decision to cancel its approval of a Commissioning Test Plan. Perth Energy proposes to insert the following words immediately prior to the last full stop of the clause: “as soon as practicable after making its decision”.

Subject to the comments above about further clarifications and improvements Perth Energy supports the intention of the proposed changes.

Perth Energy considers that the proposed changes to the Market Rules, subject to our comments above, would improve the flexibility of the Market Rules around commissioning whilst retaining full oversight and control by System Management. Retaining such flexibility in the Market Rules is important to ensure that the already complex task of commissioning a generator does not become further bogged down in unnecessary “red tape” adding to the cost of projects. In Perth Energy’s view the proposed amendments would therefore facilitate achievement of Market Objective (d)¹ relating to the long-term cost of electricity supply.

Perth Energy has not identified any impacts on the other 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-term cost of electricity supplied to customers from the South West interconnected system; and

