

RULE CHANGE NOTICE
UPDATE TO COMMISSIONING TEST PLANS
(RC_2012_12)

This notice is given under clause 2.5.7 of the Market Rules.

Date Submitted: 25 July 2012

Submitter: Fiona Edmonds the IMO

THE PROPOSAL

The IMO, Griffin Energy and Verve Energy have recently identified similar issues relating to:

- x Potential for Market Generator to be liable for civil penalties where an application for a Commissioning Test is made within the 20 Business Days notice period currently outlined in clause 3.21A.4 of the Market Rules; and
- x Inability for a Market Participant to change the proposed Commissioning Test Period as approved in their Commissioning Test plan where an extension to the test is to be undertaken.

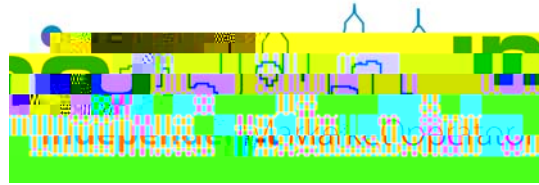
In particular, the IMO proposes to shorten the Commissioning Test Plan Trading Days before the

start date of the proposed Commissioning Test. Note that this will be a best endeavours requirement which will take into account reduced timeframes where a revision to a Commissioning Test plan is requested.

A number of further revisions to the approvals process for Commissioning Test plans are also proposed by the IMO to improve the integrity of the process and ensure

Appendix 1 contains the Rule Change Proposal and gives complete information about:

- x the proposed amendments to the Market Rules;
- x relevant references to clauses of the Market Rules and any proposed specific amendments to those clauses and
- x the



Wholesale Electricity Market Rule Change Proposal

Change Proposal No: RC_2012_12
Received date 25/07/2012

Change requested by:

Name:	Fiona Edmonds
Phone:	9254 4350
Fax:	9250 4399
Email:	fiona.edmonds@imowa.com.au
Organisation:	Independent Market Operator, 197 St Georges Terrace, Perth
Date submitted:	25/07/2012
Urgency:	Medium – to be progressed via Standard Rule Change Process
Change Proposal title:	Updates to Commissioning Test Plans
Market Rule(s) affected:	3.21A.1, 3.21A.2, 3.21A.3, 3.21A.4, 3.21A.5, 3.21A.7, 3.21A.7A, 3.21A.8, 3.21A.9, 3.21A.10, 3.21A.11 3.21A.12, 3.21A.13, 3.21A.15, 3.21A.16, 7.9.4 and the Glossary

Level 3 Governor Stirling

Introduction

Market Rule 2.5.1 of the Wholesale Electricity Market Rules provides that any person (including the IMO) may make a Rule Change Proposal by completing a Rule Change Proposal Form that must be submitted to the Independent Market Operator.

This Change Proposal can be posted, faxed or emailed to:

Independent Market Operator
Attn: Group Manager, Market Development
PO Box 7096
Cloisters Square, Perth, WA 6850
Fax: (08) 9254 4339
Email: market.development@imowa.com.au

The Independent Market Operator will assess the proposal and, within 5 Business Days of receiving this Rule Change Proposal form, will notify you whether the Rule Change Proposal will be further progressed.

In order for

Under the PSOP: Commissioning and Testing a level of flexibility is granted to Market Participants with respect to the timing for the request of a Commissioning Test plan and the details contained within each Commissioning Test Schedule(which are reflective of the indicative test plans)²:

x

covered via the provision of updated Commissioning Test Schedules to System Management in accordance with the PSOP: Facility Outages.

The IMO considers that the current Market Rules are impractical due to their inflexibility in ~~hSLAD%DE3rF0210~~

To allow for greater flexibility with respect to the application for approval of both new and revised Commissioning Test Plans and ensure that the civil penalty is not attached to the timing requirement for requesting a Commissioning Test, the IMO proposes to:

- x Amend clause 3.21A.1 to clarify the definition of a Commissioning Test as referring to a series of activities to confirm the ability

months and around the start of the Capacity Year adequate time to consider approvals of Commissioning Tests is available; and

- o reflect the amended definition of Commissioning Test under clause 3.21A.1.
- x Delete clause 3.21A.7A to remove this blank clause.
- x Amend clause 3.21A.8 to clarify that System

2. Explain the reason for the degree of urgency:

The IMO proposes that this Rule Change Proposal be progressed via the Standard Rule Change Process.

3. Provide any proposed specific changes to particular Rules: (for clarity, please use the current wording of the Rules and place a ~~strike through~~ where words are deleted and underline words added)

3.21A Commissioning Tests

- 3.21A.1. A Commissioning Test (“Commissioning Test”) is a ~~test of the~~ series of activities which confirm the ability of a generating system to operate at different levels of output reliably.
- 3.21A.2. A Market Participant ~~seeking to conducting~~ conducting a Commissioning Test for a generating system that has undergone significant maintenance or for a new generating system that has yet to commence operation, must conduct ~~request permission for~~ such tests under an approved Commissioning Test Plan ~~from System Management in accordance with clause 3.21A.4.~~
- 3.21A.3. System Management may approve a Commissioning Test Plan only for a new generating system that is yet to commence operation, or for an existing generating system that has undergone significant maintenance.
- 3.21A.4. A Market Participant requesting permission for a Commissioning Tests must use best endeavours to submit to System Management its Commissioning Test Plan for approval at least 7 Trading Days in advance of the commencement of the Commissioning Test Period. A Commissioning Test Plan must contain the following information ~~at least 20 Business Days in advance of the start date of the proposed tests:~~
- (a) the name and location of the facility to be tested;
 - (b) details of the proposed Commissioning Test Period, including start and end Trading Intervals ~~dates~~ for the proposed tests; and
 - (c) details of the proposed Commissioning Test to be undertaken ~~tests to be conducted~~, including an indicative test progr

Management and System Management must approve that revised
Commissioning Test Plan.

- (b) a Commissioning Test Plan has been approved then, subject to clause 3.21A.11, the Market Participant may proceed with that Commissioning Test.

3.21A.11. If, having approved a Commissioning Test Plan, System Management becomes aware that:

- (a) the conduct of the ~~test~~ activities at the proposed time would pose a threat to Power System Security or Power System Reliability, or in the case of a Facility returning to service after ~~extended~~ undergoing significant maintenance the return to service has been delayed, then it may delay or cancel the commencement of the Commissioning Test; or
- (b) the Commissioning Test is no longer required then it may ~~revoke~~ cancel its approval of the Commissioning Test Plan,

and must notify the Market Participant conducting the Commissioning Test of such delay or cancellation.

3.21A.12. In conducting a Commissioning Test a Market Participant must conform to the most recent Commissioning Test Plan ~~test plan~~ approved by System Management.

3.21A.13. If a Market Participant conducting a Commissioning Test cannot conform to the ~~Test Plan~~ most recent Commissioning Test Plan approved by System Management then it ~~must~~:

- (a) must inform System Management as soon as practicable; and
- (b) ~~obtain~~ may request System Management's approval ~~under this clause 3.21A.13A~~ for a ~~new~~ revised Commissioning Test Plan.

3.21A.14. [Blank]

3.21A.15. System Management must document the procedure it follows in scheduling and approving

- (a) the synchronisation is not in accordance with the relevant Resource Plan, Dispatch Instruction or Operating Instruction or an instruction issued under clause 7.6A.3(a); or
- (b) System Management considers that it would not be able to meet the criteria set out in clause 7.6.1 were synchronisation to occur; or
- (c) in the case of a Facility that is undergoing Commissioning Tests, synchronisation is not in accordance with the Commissioning Test plan

- x Greater flexibility for Market Generators seeking to undertake Commissioning Tests and for System Management in determining whether to approve a new or revised Commissioning Test within a shorter timeframe.
 - x Removal of inappropriate civil penalties associated with applications for Commissioning Tests lodged less than 20 Business Days prior to the start of the proposed tests.
 - x Removal of additional, unnecessary commissioning costs imposed on Market Generators as a result of delays to be able to complete commissioning activities.
-