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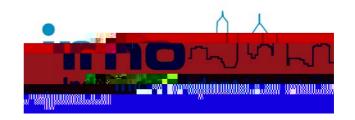
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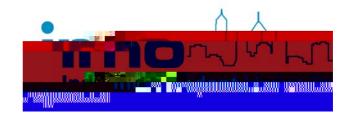
System Management appreciates this opportunity to respond to RC_2012_12 – Updates to Commissioning Test Plans. RC_2012_12 proposes to:

- Shorten the Commissioning Test Plan application period to 7 trading days before the proposed test start, with the 7 day timing requirement being on a 'best endeavours' basis
- Remove the civil penalties relating to the timing of applications for Commissioning Tests
- Provide System Management with powers to reject Commissioning Test Plans if received less than 20 trading days prior to start and accept applications or revisions to applications at reduced timeframes
- Remove the requirement for a Market Participant to apply for a new Commissioning Test Plan where changes are required to a proposed test period.

System Management supports the intent of RC_2012_12, which is to provide greater flexibility to System Management and Market Participants for the application and approval of Commissioning Test Plans.

System Management has engaged with the IMO during the first consultation phase for





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The broader Commissioning issues raised by System Management for consideration by the IMO that are not captured by RC_2012_12 include:

- The compliance obligations relating to the requirements to issue an Operating Instruction for a Commissioning Test are ambiguous and require clarification. System Management notes that the IMO has logged its concerns regarding operating instructions as an area for further review
- The need for clarity on the application of the Rules for the commissioning of non-scheduled generation
- Issues surrounding the linkage between facility registration and Commissioning
- Clarity on whether a Commissioning Test Plan should be covered by an approved planned outage and the extent of the capacity that should be included in that outage.

As stated earlier, System Management supports the intent of RC_2012_12. In particular, System Management considers that the amendments support objectives 1.2.1(a) and 1.2.1(b) contained in the Rules.