

# Rule Change Notice Commitment and De-commitment Notification Requirements (RC\_2012\_22)

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

Date Submitted: 11 December 2012

Submitter: Brendan Clarke, System Management

## The Proposal

System Management has submitted the Rule Change Proposal: Commitment and De-commitment Notification Requirements (RC\_2012\_22) to address an issue in the Market Rules where an unnecessary obligation of notification is placed on Market Participants with a Scheduled Generator connected to a distribution network. Under clauses 7.9.1 and 7.9.5, Market Participants intending to synchronise or desynchronise a Scheduled Generator must confirm with System Management.

System Management considers that most Scheduled Generators which are connected to a distribution network synchronise and desynchronise via an electrical signal received from Western Power Networks. No further confirmation is necessary to System Management in such situations. However, in accordance with clauses 7.9.1 and 7.9.5, these Market Participants would be required to confirm the synchronisation and desynchronisation of the Scheduled Generators with System Management. It should also be noted that Market Participants are subject to civil penalties under these clauses.

System Management has proposed that an exemption be created in the Market Rules for Market Participants that have Scheduled Generators connected to a distribution network and are able to satisfy System Management that safe equipment and operating procedures exist.

### **Decision to Progress the Rule Change**

The IMO has decided to progress the Rule Change Proposal on the basis that Rule Participants should be given an opportunity to provide submissions as part of the rule change process.

#### **Timeline**

The projected timelines for processing this proposal are:



## **Call for Submissions**

The IMO invites interested stakeholders to make submissions on this Rule Change Proposal. The submission period is 35 Business Days. Submissions must be delivered to the IMO by **5.00pm**, **Wednesday 6 February 2013**.

The IMO prefers to receive submissions by email (using the submission form available on the Market Web Site: <a href="http://www.imowa.com.au/rule-changes">http://www.imowa.com.au/rule-changes</a>) to: <a href="market.development@imowa.com.au">market.development@imowa.com.au</a>

Submissions may also be sent to the IMO by fax or post, addressed to:

#### **Independent Market Operator**

Attn: Group Manager, Market Development PO Box 7096

Cloisters Square, PERTH, WA 6850

Fax: (08) 9254 4399

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Address



System Management requires to be informed of the intention of any generator to synchronise in order to ensure the system will remain in a safe condition. In particular it must ensure that equipment ratings are not exceeded and there is no possibility of energising plant that is being worked on.

For transmission connected generators this notification is typically done by telephone to enable a check of the impact on the network of the generator connecting.

However, System Management believes that these obligations are unnecessary for most distribution connected generator.

For distribution connected generators a different philosophy is normally applied. Western Power Networks provides an electrical signal to the generator that allows it to synchronise without further advising Western Power Networks. When a safety issue is foreseen this signal is turned off by Western Power Networks.

Under the current Market Rules there is a requirement to provide a separate notification to System Management.

It should be noted that clauses 7.9.1 and 7.9.5 are subject to civil penalties under "Electricity Industry (Wholesale Electricity Market) Regulations 2004"

System Management proposes that it be able to give relief to Market Participants that have this type of network connection.

Conversely if these safety measures are removed then System Management proposes that this relief be withdrawn

The issue can be addressed by making amendments to clause 7.9 to allow System Management to grant exemption from this obligation.

The proposed change is given below:

- 7.9.1. Subject to clauses 7.9.1A, and 7.9.2 and 7.9.2A, if a Market Participant intends to synchronise a Scheduled Generator, then it must confirm with System Management the expected time of synchronisation:
  - (a) at least one hour before the expected time of synchronisation; and (b) must update this advice immediately if the time confirmed pursuant to clause 7.9.1(a) changes.
- 7.9.2A. System Management may advise in writing that a Market Participant that owns a Scheduled Generator connected to a distribution network is not required to confirm the expected time of synchronisation with System Management under clause 7.9.1, in respect of that Scheduled Generator, if System Management is satisfied that safe operating equipment and procedures are in place. If System Management is no longer satisfied that safe operating equipment and procedures are in place, then it must advise in writing that a Market Participant is required to confirm the expected time of synchronisation under clause 7.9.1 in respect of that Scheduled Generator..
- 7.9.5. Subject to clause 7.9.6A <u>and 7.9.6B</u>, if a Market Participant intends to desynchronise a Scheduled Generator, then it must:
  - (a) confirm with System Management the expected time of desynchronisation at least one hour before the expected time of desynchronisation; and(b) update this advice immediately if the time confirmed pursuant to clause 7.9.5(a) changes.
- 7.9.6B. System Management may advise in writing that a Market Participant that owns a Scheduled Generator connected to a distribution network is not required to confirm the expected time of desynchronisation with System Management under clause 7.9.5, in respect of that Scheduled Generator, if System Management is satisfied that safe operating equipment and procedures are in place. If System Management is no longer satisfied that safe operating equipment and procedures are in place, then it must advise in writing that a Market Participant is required to confirm the expected time of desynchronisation under clause 7.9.5 in respect of that Scheduled

The proposed rule change addresses this objective by removing an unnecessary obligation on the Market Participant.

## ★ Prov de any dent ab e costs and bene ts o t e c an existence.

## Benefits:

The costs to Market Participants are reduced.

## Costs:

No costs have been anticipated by System Management other than earre earret