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**Wholesale Electricity Market  
Rule Change Proposal Submission Form**

**RC\_2012\_25 Constrained On/Off Compensation removal where a  
Facility is non-compliant with Dispatch Instructions**

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**Submitted by**

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| <b>Name:</b>   Jacinda Papps |
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clauses 6.16A.1(b)(i), 6.16A.2(b)(i), 6.16.B.1(b)(i) and 6.16B.2(b)(i) which cover both a relevant Market Participant's non-compliance with Dispatch Instructions and Verve Energy's non-compliance with Dispatch Orders.

- (a) Any STEM Settlement Statement or Non-STEM Settlement Statement that requires correction as the result of the resolution of a dispute raised under clause 2.19, or where the IMO has indicated under clause 9.20.7 that it will revise information in response to a Notice of Disagreement; and
- (b) Any Non-STEM Settlement Statement for which the Invoicing Date occurred in the month that is three, six or nine months prior to the start of the Adjustment Process, and for which the IMO has received revised metering data from a Metering Data Agent or

- Clause 9.19.1 of the Market Rules notes that when the IMO is undertaking an Adjustment Process the IMO must take into account:
  - Actions arising from Notices of Disagreements;
  - Resolution of Disputes;
  - Revised metering data; and
  - (new) IMO determinations as to whether participants have not adequately or appropriately complied with Dispatch Instructions or Dispatch Orders.

Similarly to clause 9.16.3A, clause 9.19.1 also does not contain a reference to revisions to fees/fee rates.

As demonstrated above, although clause 9.16.3 refers to adjustments arising from revisions to fees/fee rates neither clauses 9.16.3A or 9.19.1 contain this reference. Verve Energy considers that both clauses 9.16.3A and 9.19.1 should contain a reference to revisions to fees/fee rates. While this is outside the scope of the current Rule Change Proposal, Verve Energy suggests that this disconnect be amended when deemed appropriate.

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**2. Please provide an assessment whether the change will better facilitate the achievement of the Market Objectives.**

Verve Energy considers that the Rule Change Proposal is consistent with the Wholesale Market Objectives.

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**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 in implementing these changes.**

Verve Energy would not require any changes to its IT or business systems, nor incur any organisation costs as a consequence of adopting the changes.

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

Verve Energy does not need to undertake any actions to implement this Rule Change Proposal.

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