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## Wholesale Electricity Market Submission to Rule Change Proposal

### RC\_2013\_01 Clarification of dispatch compliance obligations

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#### Submitted by

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<b>Date submitted:</b>	6 May 2013

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#### Submission

Submissions for Rule Changes should be submitted to:

##### Independent Market Operator

Attn: Group Manager, Market Development

PO Box 7096

Cloisters Square, Perth, WA 6850

Fax: (08) 9254 4399

Email: [market.development@imowa.com.au](mailto:market.development@imowa.com.au)

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- Please provide your views on the proposal, including any objections or suggested revisions.**

System Management appreciates the opportunity to provide a submission on RC\_2013\_01 Clarification of dispatch compliance obligations.

System Management agrees the intent of the Fast Track rule change proposal RC\_2013\_01 addresses a specific set of issues with section 7.10 identified as oversights when the Dispatch Compliance requirements were updated in RC\_2011\_10 Competitive Balancing and Load Following to accommodate the new Wholesale Electricity Market design.



## **SYSTEM MANAGEMENT IN SUPPORT OF RC\_2013\_01**

System Management supports the IMO's position on RC\_2013\_01 expressed at the 59<sup>th</sup> MAC meeting held on 10 April 2013, that 'System Management is providing all the relevant information to the IMO despite the potential for ambiguity that exists in the Market Rules'.

Consistent with this understanding, System Management believes its current dispatch compliance monitoring process is compliant with the amendments proposed in Rule Change Proposal RC\_2013\_01.

However in the instance the IMO's position changes, it is likely that System Management will need to consider changes to the System Management Information Technology systems and propose additional costs and extended implementation timeframes.

## **OTHER ISSUES**

Given RC\_2013\_01 is being progressed as a Fast Track Rule Change; this process may restrict the opportunity to address other issues associated with Dispatch Compliance requirements.

System Management would like to raise the following issues below for consideration by the IMO:

### **Review of System Management's requirement to 'request an explanation' in clause 7.10.5(c) of the Market Rules**

Given System Management is predominantly concerned with non compliance deviations directly impacting real time Power System Security or Reliability, it considers it is valuable to make requests for explanations in light of this.

Historically System Management has adopted a strict interpretation of this clause that System Management must simultaneously send a request for an explanation for a non compliance dispatch deviation at the same time a warning is issued. To comply with this interpretation, System Management's current dispatch compliance monitoring systems automatically issues non compliance notifications (including both a warning and a request for an explanation) in accordance with 1 minute configurations.

System Management would like the IMO to consider making the requirement for System Management to 'request an explanation' in respect of each and every deviation from a Market Participant discretionary in light of security implications. Accordingly these explanations will be reported to the IMO in accordance with clause 7.10.7(a).



**Rule Change Proposal Submission Form:**  
RC\_2013\_01  
DM # 10690379

