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## Wholesale Electricity Market Submission to Rule Change Proposal

### RC\_2013\_07 Correction of Minor and Typographical Errors

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#### Submitted by

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<b>Date submitted:</b>	2 October 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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**1. Please provide your views on the proposal, including any objections or suggested revisions.**

System Management supports this rule change which addresses numerous minor, typographical and manifest errors.

System Management notes that some of the minor changes proposed by RC\_2013\_07 relate to areas of the rules that could benefit from additional changes to that proposed. System Management has identified some of these issues below.



## **Ongoing Review of Minor, Typographical and Manifest errors**

The IMO progressed this Rule Change Proposal via the Fast Track Rule Change Process on the grounds that it satisfies clause 2.5.9 of the Market Rules.

Significant analysis of the proposal was undertaken to understand its broad impacts on System Management. System Management would like the IMO to consider submitting these types of rule changes in smaller packages on a more frequent basis ie half yearly or alternatively progressing them using the Standard Rule Change process. This will provide adequate opportunity for participants to address all issues raised.

## **Proposed amendment to Market Rules 7.10.2(c)(ii)**

It is not clear from the Market Rules who is responsible for monitoring a Facility's outage quantity against the associated dispatch non compliance (Market Rule 7.10.2(c)(ii)) . System Management would like the IMO to consider where this obligation should lie.

If the IMO specifies that System Management is required to monitor Market Rule 7.10.2(c)(ii), it is likely that System Management will need to incur costs to accommodate system, procedure and process changes to meet this obligation.

## ***Suggested amendments to other Market Rules relating to Forced Outages and Consequential Outages***

The definition of Forced Outages in Market Rule 3.21.1 and Consequential Outages in Market Rule 3.21.2 states that these outages does not meet the System Ma

**Suggested minor amendments to proposed amendments**

System Management would like the IMO to consider the following suggested minor amendments:

<b>Proposed Clause</b>	<b>Why is amendment required?</b>	<b>Suggested amendment</b>
4.1	System Management notes the term 'Year X' used through Market Rule 4.1 is capitalised. However it is not classified as a defined term in Chapter 11 Glossary.	If the IMO intends for this term to be defined, System Management suggests including the definition of 'Year X' (Market Rule 4.1.3) in the Chapter 11 Glossary.



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

The system development timeframe will be driven by the extent of changes required to align current practice to the amending Market Rules.

To the extent changes are required to accommodate suggested amendments, System Management expects it will require at least 5 months to facilitate internal and external (IMO & PSOP Working Group) consultation to progress PSOP amendments through the formal Procedure Change Process following the provision of the Final Rule Change Report.

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