

Wholesale Electricity Market Rule Change Proposal Submission

RC_2014_03: Administrative Improvements to the Outage Process (Call for Further Submissions)

Submitted by:

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Submissions on Rule Change Proposals can be sent by:

Email to: rcp.secretariat@rcpwa.com.au

Post to: Rule Change Panel
Attn: Executive Officer
C/o Economic Regulation Authority
PO Box 8469
PERTH BC WA 6849

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1. Please provide your views on the proposal, including any objections or





		Alinta would not support a material expansion of Market give ex-ante notice of Forced Outages. Alinta reserves its right to make further comment on this issue in a future submission.
	The Rule Change Panel seeks feedback from stakeholders on: 8. Any additional reasons why a Consequential Outage associated with a triggering outage might need to extend outside the period of the foreseeable constraint.	No comment.
	The Rule Change Panel seeks feedback from stakeholders on: 9. Any concerns about restricting the proposed exemption from a Reserve Capacity Test to situations where System Management has notified a Market Participant of a foreseeable constraint on its Facility, or where the Market Participant has notified System Management that its Facility will be subject to a Forced Outage in the relevant period.	No comment.
	The Rule Change Panel seeks feedback from stakeholders on: 10. What Any concerns or suggestions regarding the proposed definition for the maximum sent out capacity Standing Data items in Appendix 1(b)(iii) and Appendix 1(e)(iiiA). 11. Any concerns about the proposed changes to the method used for capturing unadjusted outage quantities for Scheduled Generators in SMMITS. 12. approach for reporting unadjusted outage quantities for Scheduled Generators that have failed to comply with an instruction from System Management (e.g. where a	proposed changes to improve and simplify the administration of the outage process. However, Alinta would like to assess this more fully once the proposed Amending Rules are available, and as such, reserves its right to make further comment on this issue in a future submission.

	<p>Scheduled Generator trips off during a Trading Interval, fails to synchronise when expected or fails to achieve the output levels specified in its Dispatch Instructions).</p> <p>13. Any concerns about the proposed changes to the method used for capturing unadjusted outage quantities for Non-Scheduled Generators in SMMITS.</p> <p>14. Any suggestions or concerns about the proposed changes relating to the calculation of capacity-adjusted outage quantities.</p> <p>15. Any concerns about the proposed removal of the requirement to report a Forced Outage because of a failure to comply with instructions during an approved Commissioning Test.</p>	
	<p>The Rule Change Panel seeks feedback from stakeholders on:</p> <p>16. Any concerns or suggestions regarding the proposed allocation of outage quantity types to provisions of the Market Rules.</p>	<p>Alinta is supportive of the intent of the proposed amendments to:</p> <ul style="list-style-type: none"> - define the unadjusted and capacity-adjusted outage quantity calculations for a Facility and Trading Interval; - clarify where unadjusted versus capacity-adjusted outage quantities should be used; and - require AEMO to use the most up to date outage information available at the time for its calculations. <p>However, Alinta would like to assess this more fully once the proposed Amending Rules are available, and as such, reserves its right to make further comment on this issue in a future submission.</p>
	<p>The Rule Change Panel seeks feedback from stakeholders on:</p> <p>17. Any concerns or suggestions regarding the proposed Planned Outage Rate, Forced Outage Rate and Equivalent Planned Outage Hours calculations.</p>	<p>Alinta would like to assess this more fully once the proposed Amending Rules are available, and as such, reserves its right to make further comment on this issue in a future submission.</p>

		<p>transparency of triggering outages. To prevent this outcome, Alinta suggests that 3.21.2A be amended such that Market Generators are eligible to apply for Consequential Outages where a Planned or Forced Outage of network equipment causes a triggering outage of their Constrained Access Facilities.</p>
	<p>The Rule Change Panel seeks feedback from stakeholders on:</p> <ol style="list-style-type: none"> 19. Whether the time periods in the proposed obligation to report extended Forced Outages in SMMITS (i.e. to report within 24 hours if the outage period exceeds 24 hours) is appropriate or whether different time periods should be used. 20. Whether the proposed deadlines for reporting Forced Outages for Non-Intermittent Generators with Capacity Credits provide an appropriate balance between prudential risk and administrative burden; and if not, what deadlines would provide a better balance. 21. Any concerns about the proposed requirement to update existing Forced Outage records within 1 Business Day of receiving more accurate information about the end time or outage quantity. 22. Any concerns about the proposed 9-month deadline for late changes to Forced Outage details in SMMITS. 23. Any reasons why stricter deadlines should be imposed on Outage Facilities that are not Scheduled Generators or Non-Scheduled Generators. 	

