

## Wholesale Electricity Market Rule Change Proposal Submission

RC\_2014\_03

### Administrative Improvements to the Outage Process

Submitted:

#### Submitted by

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	31 January 2020
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Submissions on Rule Change Proposals can be sent by:

Email to: [support@rcpwa.com.au](mailto:support@rcpwa.com.au)

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

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

Synergy appreciates the opportunity to provide feedback in response to the call for further submissions: Administrative Improvements to the Outage Process (RC\_2014\_03).

Synergy notes that the Rule Change Panel has requested feedback on 26 questions as part of its call for further submissions. Although supportive of some of the proposed changes, Synergy has concerns with the operational implications of others. These concerns include, but are not limited to:

**Question 6:** *Whether a Rule Participant should be obliged to notify System Management if it is aware that its Outage Facility will suffer a Forced Outage in the future.*

Synergy recognises the intent of the Rule Change Proposal (Proposal) and supports the notion that Rule Participants should advise System Management of impending Forced Outages.

However, the wording that a Rule Participant should notify System Management 'as soon as it becomes aware' of an upcoming Forced Outage is vague and up for interpretation. 'In the

future' bears similar issues in that the timeframe is too vast. The implications on Rule  
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Furthermore, the Scheduled Generators tripped at the same time. It is evident that the application of the proposed determination of total unadjusted outage quantity for a Scheduled Generator results in discrimination between capacity and availability.

Synergy recommends that a more accurate and equitable representation of total unadjusted outage quantity should be based on the average Available Capacity.

Application of this concept would result in the same outcome for both Scenario 1 and Scenario 2. As the Scheduled Generator had 330MW of available capacity, the total unadjusted outage quantity would therefore be the same, regardless of the dispatch instructions.

The effect of which is consistent with the application of the Rule Change Panel's proposed determination of total unadjusted outage quantity on Minimum TES.

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difficult to plan for uncertainty and enacting such a prescriptive rule may become problematic.

The wording of the proposed requirement is also open to interpretation and could be improved.

For instance, at what point should '1 Business Day start counting? If meter data is received at 3:00 PM on Monday but it was only determined to be accurate as at 4:00 PM on Tuesday, the Rule Participant would have technically received 'more accurate information' at 3:00 PM on Monday and would therefore be obligated to update existing Forced Outage records by 3:00 PM on Tuesday. Or, should the allowance for 1 Business Day to update records commence timing from 4:00 PM at which point it was determined that the information was accurate?

In addition, materiality should be considered to limit the administrative burden on Rule Participants. Rule Participants should not be required to comply to the timeframes above if the 'more accurate information' results in immaterial changes to the end time of the outage quantity. Synergy notes, however, that further thought as to what signifies as 'material' may be required.

Synergy does not wish that the transparency benefits obtained through this proposed rule change is overshadowed by the unwarranted exposure to non-compliance.

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2. Please provide an assessment whether the change will better facilitate  
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7 c3370 Tw 20p 5(200) (5) 200.005Toso nk (r2.9a)200).

In addition, Synergy understands that since the original submission of the Proposal, a significant time has transpired, such that