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

RC_2014_06 Removal of Resource Plans and Dispatchable Loads

Submitted by

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6. Section 7.5 of the Market Rules places obligations on Market Participants in relation to providing System Management with facility Fuel Declarations as derived from STEM Submissions. System Management no longer utilise this information as it is now obtaining this information from the Balancing Merit Order (BMO)
7. Currently, the IMO is required to provide a forecast and final BMO and also a forecast and final Load Following Ancillary Services (LFAS) Merit Order. The process described in the Market Rules to derive the forecast and final versions are similar but not identical. In

forecast and the final version of these merit orders. The IMO considers that the Market Rules would be clearer if these inconsistencies were removed and the same logic applied to both the forecast and final version of these merit orders.
8. Clause 7.6A.5 of the Market Rules places an obligation on Synergy and System Management to meet once a month to review the proc



8. The IMO has proposed to remove the requirement on System Management and Synergy to meet monthly.
9. The IMO has proposed to clarify how available and unavailable capacity should be included in Balancing Submissions. The IMO has proposed that Balancing Submissions should specifically provide a declaration of any quantity that will be unavailable for dispatch. Furthermore, the IMO has also proposed that the Balancing Submission for each Facility must fully account for all the Sent Out Capacity of the Facility as being either unavailable, available or a combination of the two.
10. The IMO has proposed that Non-Scheduled Generators be allowed, but not required to amend their Balancing Submissions after gate closure to allow for as accurate and up to date forecasts of output from intermittent generators to be made available to the IMO so that the IMO can use as accurate as possible information when calculating the Forecast BMO for a Trading Interval.
11. The IMO has also proposed a number of other minor changes to the Market Rules, such as updates to some of the Glossary definitions.

Perth Energy's Views

Perth Energy supports the amendments proposed by the IMO.

The Balancing Market was introduced on 1 July 2012 and made significant changes to the way that generators in the WEM participate in the market. With the changes, all generators participate in the Balancing Market and must make their generation capacity available for dispatch in the Balancing Market. This new approach has removed the importance of Resource Plans in the market. Perth Energy agrees that the information provided by Market available from their Balancing Submissions. We therefore consider it a logical step to remove the unnecessary duplication of having to provide the same information in Resource Plan submissions as is provided in Balancing Submissions.

With respect to the secondary impacts of removing Resource Plans, Perth Energy considers approach of relying on the STEM submission for





Finally, Perth Energy would like to share some concerns related to the progress of this and other proposed Market Rule changes whilst the Energy Market Review (EMR) is still continuing. The Minister for Energy provided the market with an update on the progress and future direction of the EMR on 24 March 2015. Although some high level direction on the likely design of the market for the future was provided, significant uncertainty remains and is likely to remain for at least another year. This is particularly the case for the capacity market and the role of Synergy within the market. In this environment of uncertainty it is difficult to make a compelling case for spending significant sums of money on market rule changes that may prove to be short lived. Perth Energy would like to understand the likely cost of



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

Perth Energy will require about 2 weeks to implement necessary changes to its procedures and systems following a decision to implement this rule change.