

Final Rule Change Report: Formalisation of the Process for Maintenance Applications (RC_2015_03)

Standard Rule Change Process

25 June 2019

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1. Rule Change Proposal, Process and Timeline

On 27 March 2015, the Independent Market Operator (**IMO**) submitted a Rule Change

The Market Rules allow a Market Customer to apply to AEMO to replace or disregard a Relevant Demand (**RD**) of a Demand Side Programme (**DSP**), Temperature Dependent Load (**NTDL**). The objective of the Rule Change Proposal is to streamline and formalise the processes relating to these applications.

The Rule Change Proposal was processed using the Standard Rule Change Process described in section 2.7 of the Market Rules.

The timeframes for the first submission period and the preparation of the Draft Rule Change Report were extended by the IMO under clause 2.5.10; and the timeframe for the preparation of the Draft Rule Change Report was further extended by the Rule Change Panel under clauses 1.18.3(b) and 2.5.10. Further details of the extensions are available on the Rule

On 23 October 2018, the Rule Change Panel published a call for further submissions (**CFFS**) on the Rule Change Proposal. The further submission period closed on 13 November 2018.

The key dates for progressing the Rule Change Proposal, as amended in the extension notices, are:

↓
●
25 Jun 2019

All documents related to the Rule Change Proposal can be found on the Rule Change https://www.erawa.com.au/rule-change-panel/market-rule-changes/rule-change-rc_2015_03.

2. The Rule

form, as set out in section 8 of this report.

2.1 Reasons for the Decision

The Rule Change Panel has made its final decision on the basis that the Amending Rules, as modified in this report will:

increase the clarity and efficiency of the process for Consumption Deviation Applications (**CDA**) through:

- the requirement for the processes to be documented in a Market Procedure; and
- the introduction of timelines for submitting and processing CDAs;

reduce the risk of AEMO rejecting CDAs by clarifying the process;

incentivise Market Customers to submit compliant CDAs through AEMO to charge an Application Fee if it needs to clarify or request further information from a Market Customer;

allow for the efficient and equitable allocation of additional costs incurred by AEMO where it needs to clarify or request further information from a Market Customer through its ability to charge an Application Fee;

reduce costs to Market Participants who do not directly benefit from a CDA through:

- increased clarity and efficiency of the processes; and
- the ability for AEMO to charge an Application Fee

Table 1: Summary of Proposed Changes and Associated Reasons

Proposed Change	Reason for Proposed Change
Formalise the process for CDAs, including by introducing a head of power for the IMO to develop a Market Procedure specifying the processes that AEMO and Market Customers must follow.	The IMO considered that a requirement to follow a formalised process when submitting a CDA, and to document that process in a Market Procedure, would provide for more certainty and efficiency in the process of determining the RD for a DSP and NTDL status.
Introduce an Application Fee payable for each submitted CDA.	The IMO noted that it incurred significant administrative costs as a result of the volume of CDAs submitted and that the cost of processing the applications was primarily recovered from Market Participants not utilising CDAs.
Introduce timeframes by which CDAs must be submitted.	Introducing timeframes by which CDAs must be submitted by a Market Customer would give the IMO sufficient time to process the CDAs.
Administrative changes.	The IMO proposed a number of administrative changes to improve the clarity of the Market Rules by improving the drafting and streamlining the process to reflect the logical sequence of a CDA.

Full details of the Rule Change Proposal are available on [www.aemo.com.au](#).

3.2 The IMO s Initial Assessment of the Proposal

The IMO decided to progress the Rule Change Proposal on the basis of its preliminary assessment that the proposed amendments were likely to better achieve Wholesale Market Objectives (CJF070) and be consistent with the 2012 Views on Wholesale Market Objectives (CJF070) and be consistent with the 2012 Views on Wholesale Market Objectives (CJF070).

The following key points were discussed.

Mr Michael Zammit³ supported the proposed changes and suggested the IMO involve affected Market Customers in the development of the Market Procedure.

Mr Simon Middleton⁴ asked if the proposed changes were introducing obligations for DSPs similar to the existing obligations for Scheduled Generators to register Outages. The Chair clarified that this was not the case. The Chair noted that under the current Market Rules, Market Customers had the option to apply to the IMO to replace or disregard a period unrepresentative of the consumption of a Load for the purposes of determining the RD changes would formalise these existing processes.

Mr Geoff Gaston⁵ asked if one application could cover several maintenance events or if every maintenance event required a separate application. Ms Laura Koziol of the IMO explained that one application could cover all maintenance undertaken during relevant Trading Intervals for either determining RD or NTDL status.

Mr Gaston asked if the calculations for the determination of RD and NTDL status could be included in the new Market Procedure or another document. Ms Kate Ryan⁶ noted that the RD was calculated by a tool within the Market Participant Interface and that the tool was available for Market Customers to also use.

Procedure. Ms Ryan clarified that some engagement had already occurred, and the IMO would consult with Market Customers on the Market Procedure through the IMO Procedure Change and Development Working Group as well as through the formal submission process.

Mr Peter Huxtable⁷ sought confirmation that the invoicing of the new Application Fee would be a simple process and not involve unnecessary costs. Ms Ryan confirmed that a simple invoice would be used for the new Application Fee.

Ms Wendy Ng⁸ asked if the IMO knew why there had been an increase in the number of applications. Mr Zammit answered that there had been an increase in the number of Associated Loads and that many of these Loads shut down or undertake maintenance during the relevant periods. The Chair noted that Market Customers were using the options available in the Market Rules to provide better outcomes for their customers. Ms Ryan also noted that the applications included numerous repeat applications where

Further details of the MAC meeting are available in the MAC meeting papers and minutes available



achieve the Wholesale Market Objectives is summarised in Table 2.

Table 2: Submitters Comments on the Wholesale Market Objectives

Submitter	Wholesale Market Objective Assessment
Community Electricity	Community Electricity considers that the Rule Change Proposal will: promote Wholesale Market Objective (c) [non-discrimination] by more properly allocating costs to users; promote Wholesale Market Objective (a) [efficiency] by allocating costs to users; and promote Wholesale Market Objective (d) [minimising costs] through clarifying the requirements of a successful application and thereby avoiding fruitless administration.
EnerNOC	If the issues raised in its submission are addressed, EnerNOC agrees with Market Objectives (c) and (d).
Perth Energy	Subject to its comments about DSPs, Perth Energy considered the proposed changes would improve the transparency of the Market Rules and improve on cost allocation and fairness with the allowance for the IMO to charge its reasonable costs for processing these applications. Perth Energy also considered the proposed changes would improve the overall efficiency of the market, through the improved transparency of the process by explicitly describing its requirements in a Market Procedure, and also through the incentives introduced by charging applicants for the reasonable costs incurred by the IMO in processing their applications. Perth Energy considered the proposed changes on balance were likely to positively impact the ability to achieve Wholesale Market Objectives (a) and (d). Perth Energy did not identify any impacts on the remaining Wholesale Market Objectives.

Copies of all submissions received during the first submission period are available on the

4.3

The Rule Change Panel sought further submissions from stakeholders on the Rule Change Proposal.

A copy of the CFFS is available

4.5 Submissions Received During the Further Submission Period

The further submission period was held between 24 October 2018 and 13 November 2018. The Rule Change Panel received submissions from AEMO, Alinta Energy and Simcoa Operations.

AEMO supported the proposed Amending Rules and considered it would enable AEMO to clearly define the CDA process for RD and NTDL assessments, costs by reducing the number of incomplete or erroneous submissions, and allow for cost recovery through a causer pays model.

Alinta supported formalising and prescribing

the deadline would not allow sufficient time for Market Customers to resubmit a CDA if the initial CDA was rejected by AEMO; and

the relevant Trading Intervals for the calculation of RD could change.

Simcoa also raised several issues relating to the current methodology in the Market Rules for determining

The assessment by submitting parties as to whether the Rule Change Proposal would better achieve the Wholesale Market Objectives is summarised in Table 3.

Table 3: Submitters Comments on the Wholesale Market Objectives

Submitter

section 5.2 of the Draft Rule Change Report (which is reproduced in Appendix A of this report).

4.7 Submissions Received During the Second Submission Period

The second submission period was held between 29 March 2019 and 1 May 2019. The Rule Change Panel received a submission from AEMO.

AEMO has revised its position with respect to the requirement for a Market Customer to submit a CDA where the deviation in the level of consumption of a Load was due to a request from System Management. Following its preliminary investigations, AEMO was not aware of any practical reason for the obligation for a Market Customer to provide information on System Management requests to AEMO. However, AEMO has stated that, on further investigation and reflection, because DSPs are dispatched at a Facility level, AEMO does not have visibility of which Associated Load reduced its consumption to comply with a Dispatch Instruction (except where there is only one Load associated with the DSP). Therefore, the requirement for Market Customers to provide that information to AEMO via a CDA should remain, and proposed new clause 4.26.2CC(b) should be amended to enable an Application Fee to be charged.

AEMO expressed concerns with the application of proposed new clauses 4.26.2CF and 4.28.9F. These clauses provide that, for Loads that are both an Associated Load and a Load assessed for NTDL status, AEMO is precluded from charging an Application Fee with respect to an event in a subsequent CDA that was already assessed and accepted by AEMO in an earlier CDA. AEMO stated that it understands the intent of these clauses, but considers they could only be applied to a CDA with a single maintenance event, or where there are multiple events but they are all captured in both CDAs, and do not cater for CDAs with multiple maintenance events that are not identical across both CDAs. AEMO outlined two examples to demonstrate the issue and requested changes to these clauses to clarify how they apply to CDAs with multiple maintenance events that are not identical across both CDAs.

AEMO stated that its preferred solution would be for the Application Fee to apply in all cases, except where both submissions for a particular Load contain exactly the same maintenance events over the same Trading Intervals.

AEMO agreed with the Wholesale Market Objectives assessment in section 5.4 of the Draft Rule Change Report, but considered the complexity associated with the administration of the Application Fee (proposed new clauses 4.26.2CF and 4.28.9F) would result in a more inefficient market outcome. AEMO considered this was evident with the requirement to manually compare two submissions from the same Load to determine the appropriate Application Fee.

4.8 Received During the Second Submission Period

second submission period is detailed in Appendix B of this report. A more general discussion of the Rule Change Proposal, which addresses the main issues raised in the submission and the section 7.2 of this report.

4.9 Public Forums and Workshops

The Rule Change Panel did not hold a public forum or workshop for the Rule Change Proposal.

5. Draft Assessment

clauses 2.4.2 and 2.4.3 and analysis of the Rule Change Proposal are provided in section 5 of the Draft Rule Change Report.

6. Draft Rule Change Report

the Rule Change Report was to accept the Rule Change Proposal in a modified form, as set out in section 7 of the Draft Rule Change Report.

Draft Rule Change Report.

7. The

7.1 Assessment Criteria

In preparing its Final Rule Change Report, the Rule Change Panel must assess the Rule Change Proposal in light of clauses 2.4.2 and 2.4.3.

must not make Amending Rules unless it is satisfied that the Market Rules, as proposed to be amended or replaced, are consistent with the Wholesale Market Objectives

Clause 2.4.3 states that, when deciding whether to make Amending Rules, the Rule Change Panel must have regard to:

- any applicable statement of policy principles the Minister has issued to the Rule Change Panel under clause 2.5.2;
- the practicality and cost of implementing the proposal;
- the views expressed in submissions and by the MAC; and
- any technical studies that the Rule Change Panel considers necessary to assist in assessing the Rule Change Proposal.

In making its final decision, the Rule Change Panel has had regard to each of the matters described in clauses 2.4.2 and 2.4.3 as follows:

- the Rule Ch Wholesale Market Objectives is available in section 7.4 of this report;
- the Rule Change Panel notes that there has not been any applicable statement of policy principles from the Minister in respect of the Rule Change Proposal;
- the Rule Change Proposal is available in section 7.6 of this report;

Even though such Market Customers must submit two CDAs, as stated in the Draft Rule Change Report the Rule Change Panel considered that it would be inappropriate

the potential difference in the number of events in a CDA that will need to be assessed;
and

and associated systems and processes, are changed in the future, then it may be appropriate to reconsider introducing an Application Fee.

7.2.2 Manifest Error

The Rule Change Panel considered that the obligation in Step 2(c) of Appendix 10¹⁰ that a Market Customer provide evidence to AEMO that the Associated Load was operating at below capacity due to its consumption being reduced at the request of System Management was a manifest error (see section 5.6.3 of the Draft Rule Change Report, which is reproduced at Appendix C of this report). The Rule Change Panel indicated that it would address this manifest error when AEMO was in a position to implement the required system changes. The Rule Change Panel was based on confirmation from AEMO that it was not aware of any practical reason for the obligation for a Market Customer to provide information to AEMO regarding System Management requests.

In its second submission, AEMO has stated that, on further investigation and reflection, because DSPs are dispatched at a Facility level, AEMO does not have visibility of which Associated Loads reduced their consumption to comply with a Dispatch Instruction (except where there is only one Load associated with the DSP). Therefore, the requirement for Market Customers to provide that information to AEMO should remain.

Based on this new information, the Rule Change Panel agrees with AEMO that the obligation in Step 2(c) of Appendix 10 is not a manifest error for DSPs that contain more than one Associated Load.

The Rule Change Panel also considers that the requirement in Step 2(c) of Appendix 10 may not be a manifest error with respect to a DSP with a single Associated Load if the intent was to put the administrative burden onto Market Customers to submit a CDA when consumption of an Associated Load was reduced at the request of System Management. This is because, historically the IMO, and AEMO up until the time System Management functions were conferred on it, were provided with dispatch data by System Management.

Nevertheless, even if that was not the intent, due to the historical and current low number of DSPs with a single Associated Load, any system changes to remove the obligation would be unlikely to pass a cost-benefit assessment, and would not outweigh the inconvenience and cost to a Market Customer of having to submit a CDA.

Consequently, the Rule Change Panel no longer intends to remove the requirement for a Market Customer to submit a CDA to AEMO where the consumption of a Load was reduced at the request of System Management, as was proposed in the Draft Rule Change Report.

7.3 Additional Changes to the Proposed Amending Rules

7.3.1 Changes to the Market Rules Affecting the Rule Change Proposal

In the CFFS, the Rule Change Panel made changes to the proposed Amending Rules to account for the changes made to the Market Rules since the Rule Change Proposal was published, and for the changes introduced by RC_2017_06: Reduction to the prudential exposure in the Reserve Capacity Mechanism, that commenced on 1 June 2019 (RC_2017_06).

¹⁰ As part of the overall amendments to streamline the processes for CDAs, the obligation at Step 2(c) of Appendix 10 of the Market Rules has been moved to new clause 4.26.2CB(a)(ii).

A summary of these changes is provided at Part A of Appendix C of this report and shown in detail at section 7 of the Draft Rule Change Report.

7.3.2 Amendments Following the Further Submission Period

Following the further submission period, the Rule Change Panel made changes to the proposed Amending Rules. A summary of these changes is provided in Part B of Appendix C of this report, and shown in detail at section 7 of the Draft Rule Change Report.

7.3.3 Amendments Following the Second Submission Period

Following the second submission period, the Rule Change Panel has made changes to the proposed Amending Rules. The changes are summarised in Table 4 and are detailed in Appendix D of this report.

Table 4: Amendments Following the Second Submission Period

Market Rule

Change Report) due to the complexity associated with how and when the Application Fee would apply. AEMO stated that it would include this in its determination of the level of Application Fee and did not anticipate any additional staffing requirements as a result of the Rule Change Proposal.

AEMO the power to charge an Application Fee only where it needs to clarify or request further information from a Market Customer with respect to a CDA, the complexity, and therefore cost of administering the Application Fee would be substantially reduced.

AEMO confirmed in its further submission that no system changes were anticipated as a result of the proposed changes described in the CFFS. RCP Support has confirmed with AEMO that this remains the case with respect to the Amending Rules in this report.

RCP Support engaged with Simcoa to clarify the implications that the proposed changes would have on it. Simcoa confirmed that it did not expect any additional costs due to the proposed changes, if

updating the Market Procedure: Individual Reserve Capacity Requirement, which currently provides some details regarding the process for CDAs relating to the assessment of a Loa

AEMO may also need to make changes to a range of market documents published by it, including market design summaries and user guides.

The Economic Regulation Authority is the Responsible Procedure Administrator for the Monitoring Protocol that may be affected by the proposed Amending Rules.

8. Amending Rules

The Rule Change Panel proposes to implement the following Amending Rules (~~deleted text~~, added text, clauses that are included for context but not amended).

2.24.1. The fees charged by AEMO are:

- (b) Application Fees described in clauses 2.33.1(a), 2.33.2(a), 2.33.3(a), 2.33.4(a), 2.33.5(a), ~~and 4.9.3(c)~~, 4.26.2CC and 4.28.9B; and

4.26.2CA. The Relevant Demand of a Demand Side Programme for a Trading Day d in a Capacity Year is the lesser of:

- (a) a value determined for the Demand Side Programme using the methodology set out in Appendix 10; and
- (b) the sum of Individual Reserve Capacity Requirement Contributions of the Associated Loads of the Demand Side Programme for the Trading Month in which Trading Day d falls.

4.26.2CB. For the purposes of step 2(c) of Appendix 10:

- (a) a Market Customer may submit a Consumption Deviation Application to AEMO in accordance with the Market Procedure referred to in clause 4.26.2CE, in respect of an Associated Load for the previous Capacity Year, if:
 - i. the level of consumption of the Associated Load was affected in a Trading Interval; and
 - ii. the Market Customer considers that the deviation in the level of consumption was due to:
 - 1. a request received from System Management; or
 - 2. a maintenance event; and

to in clause 4.26.2CD, must be submitted on or before the date which is 30 days from commencement of the Association Period for that Associated Load.

4.28.8. To assist AEMO in determining Indicative Individual Reserve Capacity Requirements in accordance with clause 4.28.6 and Individual Reserve Capacity Requirements in accordance with clause 4.28.7 for the Capacity Year starting on 1 October of Year 3 of a Reserve Capacity Cycle, Market Customers must, by the date and time specified in clause 4.1.23, provide to AEMO:

- (a) the identity of all interval meters associated with that Market Customer which measure Loads that it nominates that the Market Customer wants AEMO to treat as Non-Temperature Dependent Loads;

4.28.8C. Subject to clause 4.28.11, a Market Customer may provide to AEMO:

- (a) the identity of additional interval meters (to those provided under clause 4.28.8) associated with the Market Customer which measure Loads that it nominates that the Market Customer wants AEMO to treat as Non-Temperature Dependent Loads for the remainder of the relevant Capacity Year; and

4.28.9A. A Market Customer may submit a Consumption Deviation Application to AEMO in accordance with the Market Procedure referred to in cID 1-BDC q0.000008871 0f1 0 0 158875in c

~~load measured by an interval meter nominated in accordance with clauses 4.28.8(a) or 4.28.8C(a) as a Non-Temperature Dependent Load.~~

For the purpose of this Appendix:

AEMO must use the current set of meter data (as at the time when it commences its calculations)~~the meter data to be used in any calculations is to be the most current set of meter data as at the time of commencing the calculations;~~ and

the 4 Peak SWIS Trading Intervals in a Trading Month are the 4 Peak SWIS Trading Intervals determined and published by AEMO under clause 4.1.23B for that Trading Month.

AEMO must perform the following steps (in sequential order) when determining whether or not in deciding whether to accept, ~~in accordance with clause 4.28.9,~~ a load measured by an interval meter nominated in accordance with clauses 4.28.8(a) or 4.28.8C(a) as a Non-Temperature Dependent Load for the purposes of clause 4.28.9:

Step 1:

If, in accordance with clause 4.28.8(a),

- (b) the metered consumption for the Load did not deviate downwards from the median consumption value in paragraph (a) by more than 10% for more than 10% of the time during the period from the start of the Trading Month for which metered consumption ~~values were~~was used by AEMO to accept the

Appendix A. Extract of the Assessment of the Proposed Changes in the Draft Rule Change Report

A.1 Formalisation of the Process to Submit a Consumption Deviation Application

The IMO proposed to formalise the process for CDAs, including by introducing a head of power for AEMO to develop a Market Procedure specifying the process that AEMO and Market Customers must follow.

The Rule Change Panel agrees with the IMO that formalising the process for submitting a CDA will provide for more certainty and efficiency in the process of determining the RD for a

The process for CDAs relating to the calculation of RD for DSPs is currently outlined in

However, the Rule Change Panel notes that there is currently no clear head of power in the Market Rules for the process for CDAs to be documented in a Market Procedure.

The Rule Change Panel considers that prescriptive processes setting out how an obligation or requirement in the Market Rules is to be performed, complied with or assessed should typically be set out in a Market Procedure, to the extent possible, and not in the Market Rules.

The Rule Change Panel considers that a Market Procedure documenting the process a Market Customer is required to follow when submitting a CDA:

will provide clarity to Market Customers regarding the:

process, and the information and evidence to be provided in support of a CDA;

processes AEMO must follow when it receives a CDA;

criteria AEMO must consider when deciding whether to accept or reject a CDA; and

should reduce the risk of AEMO rejecting a CDA due to a Market Customer not being fully aware of the process or the information and evidence required to be submitted in support of a CDA.

The Rule Change Panel notes that the Market Procedure will be subject to the governance framework in the Market Rules with respect to the development of, and amendments to, Market Procedures, which includes the requirement for consultation. The Rule Change Panel considers that matters that could affect the financial outcomes of Market Participants, such

formal standing under the Market Rules.

Therefore, the Rule Change Panel supports the proposed formalisation of the process for

A.2 Application Fee

The IMO proposed to introduce the requirement for a Market Customer to pay an Application Fee when submitting a CDA.

The Rule Change Panel agrees with the IMO that the introduction of an Application Fee¹² for processing a CDA would provide for a more equitable recovery of the costs associated with processing the application, by recovering the costs from the causer and beneficiary of the application.

all of the Trading Intervals affected by the maintenance event in the subsequent CDA were specified in the earlier accepted CDA.

Therefore, the Rule Change Panel proposes to further amend the proposed Amending Rules accordingly.

The Rule Change Panel considers that the introduction of an Application Fee will:

- allow for the efficient and equitable allocation of costs to the parties that cause the cost to be incurred (the Rule Change Panel also notes that those parties have the ability to manage the costs they pay);

- reduce the costs to Market Participants that do not directly benefit from a successful assessment; and

- provide an incentive for Market Customers to submit CDAs that are compliant with the Market Procedure; and may help to mitigate the number of non-compliant submissions

submitting Market Customer and could lead to adverse outcomes for the Market Customer. The Rule Change Panel considers that the introduction of a deadline for AEMO to assess CDAs will increase certainty in the process for Market Customers.

The Rule C Rules is provided in the remainder of this section.¹⁵

RD and CDAs relating to the assessm

The Rule Change Panel supports the approach to assign different deadlines for the

are different processes with different timelines and occurrences under the Market Rules, and refer to different reference periods.

DSPs

31 October in the Capacity Year to which the RD applies.

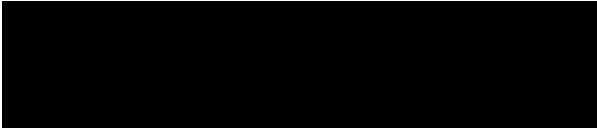
RCP Support engaged with AEMO regarding the appropriateness of the suggested deadline. AEMO clarified that the proposed deadline will ensure that AEMO has enough time to assess e undertaken between 1 October and 30 November (section 4.25A of the Market Rules).

In its response to the call for further submissions, Simcoa expressed concerns that the Trading Intervals comprising the 200 Calendar Hours relevant to the calculation of a RD, are determined for each Trading Day and may be subject to change after 31 October based on updated meter data. Therefore, the proposed deadline may result in Market Customers choosing to prepare CDAs for all maintenance events during the full Capacity Year prior to the Capacity Year to which the RD applies, instead of only preparing CDAs for the Trading Intervals comprising the 200 Calendar Hours. The Rule Change Panel agrees with Simcoa that the uncertainty of the Trading Intervals comprising the 200 Calendar Hours and the proposed deadline for the submission of CDAs, may lead to additional administrative burden, including:

Market Customers having to predict which Trading Intervals in the prior Capacity Year will be relevant over the full Capacity Year where they choose to only submit CDAs for those relevant Trading Intervals, and not wanting to risk missing any of the relevant Trading Intervals in its CDAs; and

Market Customers may include Trading Intervals in a CDA that later turn out to be irrelevant for the calculation of RD.¹⁶

The Rule Change Panel notes that this issue is inherent in the current methodology for determining the RD for DSPs, and as Simcoa states in its ra.E nBT/Ft37tn.92 reW*nBT/F1n1v9n its

Proposed Amendment	
Amend clause 4.26.2CA to more clearly articulate which 32 Trading Intervals are used to determine RD.	Clause 4.26.2CA has changed since the Rule Change Proposal and the proposed amendments are no longer applicable.
Amend Appendix 5A (NTDL Load Requirements) to more clearly distinguish and to align the language with the proposed amendments in clause 4.28.8.	The Rule Change Panel agrees with the proposed changes to Appendix 5A, and proposes further changes to Appendix 5A to ensure the amendments are consistent with the Amending Rules in RC_2017_06: Reduction of the prudential exposure in the Reserve Capacity Mechanism which commenced on 1 June 2019.
Correction of minor and typographical errors.	

proposed new clause 4.26.2CB(a)(ii)), and Steps 1(b)(iii), 2(b)(iii) and 3(b)(iii) (in the case of proposed new clause 4.28.9A(b)) of the current Market Rules which refer to deviations in the

consistent with the intent of the proposed new clauses.

Appendix B. Responses to Submissions Received in the Second Submission Period

Issue	Submitter	Comment/Issue Raised	
1	AEMO	<p>AEMO has revised its previous view and believes that the requirement in Step 2(c) of Appendix 10 for a Market Customer to provide information on System Management requests to AEMO must remain in place, due to the manner in which DSPs are dispatched.</p> <p>AEMO has stated that because DSPs are dispatched at a Facility level, it does not have visibility of which Associated Load reduced its consumption to comply with the Dispatch Instruction (except in the instance where there is only one Load associated with the DSP).</p> <p>AEMO has stated that if the Relevant Demand calculation</p> <p>Intervals during which a Load was subject to dispatch, Step 2(c) of Appendix 10 must remain as currently drafted in the Market Rules. This will enable Market Customers undertaking the CDA process to advise AEMO of any Trading Intervals where an Associated</p> <p>System Management and, therefore, have this reflected in its Relevant Demand.</p>	Please refer to section 7.2.2 of this report.
2	AEMO	As a consequence of the requirement in	

Appendix C. Extract of the Manifest Error Determination in



Appemg0 0.46

Part B: Amendments following the Further Submission Period



Appendix E. Further Amendments to the Proposed Amending Rules

The Rule Change Panel made some amendments to the proposed Amending Rules following the end of the second submission period. These changes are as follows (~~deleted text~~, added text):

2.24.1. The fees charged by AEMO are:

- (b) Application Fees described in clauses 2.33.1(a), 2.33.2(a), 2.33.3(a), 2.33.4(a), 2.33.5(a), 4.9.3(c), ~~4.26.2CB(b)~~ 4.26.2CC and 4.28.9B; and

4.26.2CB. For the purposes of step 2(c) of Appendix 10:

- (a) a Market Customer may submit a Consumption Deviation Application to AEMO in accordance with the Market Procedure referred to in clause 4.26.2CE, in respect of an Associated Load for the previous Capacity Year, if:
 - i. the level of consumption of the Associated Load was affected in a Trading Interval; and
 - ii. the Market Customer considers that the deviation in the level of consumption was due to:
 - 1. a request received from System Management; or
 - 2. a maintenance event; and
- (b) AEMO must accept or reject a Consumption Deviation Application submitted under clause 4.26.2CB(a) by the time specified in clause 4.26.2CHG.

~~4.26.2CC. An Application Fee is:~~

- ~~(a) subject to clause 4.26.2CF, payable by a Market Customer to cover the cost of processing a Consumption Deviation Application submitted under clause 4.26.2CB(a) where the reason specified in the Consumption Deviation Application for a deviation in the level of consumption of the Associated Load was due to a maintenance event; and~~
- ~~(b) not payable by a Market Customer for a Consumption Deviation Application submitted under clause 4.26.2CB(a) where the reason specified in the Consumption Deviation Application for a deviation in the level of consumption was due to a request from System Management.~~

4.26.2CC. AEMO may charge an Application Fee to cover its costs of requesting clarification or further information of any aspect of a Consumption Deviation Application in accordance with clause 4.26.2CF.

4.26.2CD. A Consumption Deviation Application submitted under clause 4.26.2CB(a) must:

- (a) subject to clause 4.26.2CH, be submitted as soon as practicable but, in any event, on or before 31 October in the Capacity Year to which the Relevant Demand applies; and
- (b) contain, or be accompanied by, the information specified in the Market Procedure referred to in clause 4.26.2CE.

4.26.2CF. Where:

(a) AEMO has accepted a Consumption Deviation Application submitted under clause 4.28.9A in accordance with the Market Procedure referred to in clause 4.28.9E; and

(b) the same Market Customer submits a Consumption Deviation Application in respect of the same Load in accordance with clause 4.26.2CB(a);

then, an Application Fee is not payable in respect of the subsequent Consumption Deviation Application submitted under clause 4.26.2CB(a) provided that:

(c) the maintenance event specified in the subsequent Consumption Deviation Application is the same as a maintenance event specified in an earlier

Consumption Deviation Application specified in the TJ ET Q 120.56 428.38 399.94 0.78 re f* 12

4.28.9A. A Market Customer may submit a Consumption Deviation Application to AEMO in accordance with the Market Procedure referred to in clause 4.28.9FE, in respect of a Load that it has nominated as a Non-Temperature Dependent Load under clause 4.28.8(a) or clause 4.28.8C(a) and a Trading Interval, if:

- (a) the level of consumption of the Load was affected in the Trading Interval;
and
- (b) the Market Customer considers that the deviation in the level of consumption was due to:
 - i. the Trading Interval falling on a Trading Day that is not a Business Day; or
 - ii. a maintenance event.

~~4.28.9B. Subject to clause 4.28.9F, a Market Customer must pay an Application Fee for a Consumption Deviation Application submitted under clause 4.28.9A to cover the cost of processing the application.~~

4.28.9B. AEMO may charge an Application Fee to cover its costs of requesting clarification or further information of any aspect of a Consumption Deviation Application in accordance with clause 4.28.9F.

4.28.9F. Where:

- ~~(a) AEMO has accepted a Consumption Deviation Application submitted under~~

