

# WHOLESALE ELECTRICITY MARKET

## Submission to Procedure Change Proposal

**AEPC\_2017\_04**

**Market Procedure - Certification of Reserve Capacity**

<b>Submitted by</b>	
<b>Name:</b>	<b>Ignatius Chin</b>
<b>Phone:</b>	+61 8 9261 2888
<b>Fax:</b>	+61 8 9261 2880
<b>Email:</b>	<a href="mailto:ignatius.chin@bluewatersps.com.au">ignatius.chin@bluewatersps.com.au</a>
<b>Organisation:</b>	Bluewaters Power
<b>Address:</b>	225 St Georges Terrace Perth WA 6000
<b>Date submitted:</b>	8 August 2017

### Submission

Clause 2.10.7 of the Wholesale Electricity Market Rules provides that any person may make a submission for a Procedure Change Proposal (including proposals developed by AEMO, the Economic Regulation Authority or the Rule Change Panel) by completing this Procedure Change Submission form.

Submissions should be provided by email to the nominated contact in the call for submissions published with the Procedure Change Proposal.

**Please provide your views on the Procedure Change Proposal, including any objections or suggested revisions**

Section 4.4.1(a) of the proposed amended Market Procedure: Certification of Reserve Capacity (Market Procedure) states that “AEMO must not assign Certified Reserve Capacity to a Facility that” “is not operational or is not scheduled to first commence operation by 1 October of Year 3 (the Reserve Capacity Obligation commencement date) of the relevant Reserve Capacity Cycle”. This provision is also reflected in clause 4.11.1(c)(ii) of the Market Rules.

Under this provision, “not being operational” would be a sufficient condition for AEMO not assigning Certified Reserve Capacity to a Facility. However, it is not entirely clear as to when should the Facility be not operational for AEMO to be not able to assign the Certified Reserve Capacity.

Following a discussion with AEMO on 4 August 2017, AEMO clarified that the interpretation should be “not operational by 1 October of Year 3 (the Reserve Capacity Obligation commencement date) of the relevant Reserve Capacity Cycle”.

Bluewaters recommends that the AEMO reflects the above clarification in the Market Procedure.

**Please provide an assessment whether the Procedure Change Proposal is consistent with the Market Objectives and the Wholesale Electricity Market Rules.**

No comments.

**Please indicate if the Procedure Change Proposal will have any implications for your organisation (for example changes to your IT or business systems) and any costs involved in implementing these changes.**

No comments.

**Please indicate the time required for your organisation to implement the changes, should they be accepted as proposed.**

No comments.