

Wholesale Electricity Market Submission to Procedure Change Proposal

PC_2013_09: Changes to Market Procedure for Reserve Capacity Performance Monitoring

Submitted by

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Submission

Clause 2.10.7 of the Wholesale Electricity Market Amending Rules provides that any person may make a submission for a Procedure Change Proposal by filling in this Procedure Change Submission form.

Submissions for Procedure Changes that relate to the Power System Operation Procedures and IMO Market Procedures should be submitted to:

Independent Market Operator

Attn: Group Manager, Market Development

PO Box 7096

Cloisters Square, Perth, WA 6850

Fax: (08) 9254 4399

Email: market.development@imowa.com.au

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

Proposed changes

The Independent Market Operator (IMO) proposes a number of changes to the Market Procedure for Reserve Capacity Performance Monitoring to implement a number of rule changes including:

RC 2010 14: Certification of Reserve Capacity; and

RC_2013_09: Incentives for the Availability of Scheduled Generators.

In addition to ensuring the Market Procedure remains consistent with the Amending Rules resulting from the above-mentioned rule changes the IMO also proposes to:

- Provide additional detail around the process and timelines for the provision of Reserve Capacity Performance Reports and Reserve Capacity Performance Improvement Reports; and
- Improve the clarity and integrity of the Market Procedure and its consistency with the IMO's standard format for Market Procedures.

Alinta's views

During 2011 Alinta was actively involved in the consultation process for RC_2010_14. Likewise Alinta has been actively involved in the more recent consultation process for RC_2013_09. The views provided in this submission are intended to supplement those views presented previously and so should be read in conjunction with Alinta's formal submissions on the relevant rule changes. Note that rather than simply re-stating Alinta's position on each of the rule changes this submission is intended to provide additional suggestions that relate directly to the proposed amendments to the Market Procedure.

Proposed changes to Market Procedure

Alinta is generally supportive of the IMO's proposed amendments to the Market Procedure for Reserve Capacity Performance Monitoring. We offer the following minor comments on the proposed amendments:

- Step 2.2.11: Suggest the following amendment is made to ensure consistency with the remainder of the procedure: "The IMO must acknowledge via by email..."
- Step 2.2.19: Suggest reviewing the spacing associated with the punctuation in this step.