
Wholesale Electricity Market – Submission to Procedure Change Proposal

PC_2010_06

Market Procedure for Certification of Reserve Capacity

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 should be submitted to:

Western Power Networks - System Management Division

Attn: Alistair Butcher, Market Strategic Development Manager
GPO Box L921
Perth WA 6842
Fax: (08) 9427 4228
Email: market.development@westernpower.com.au

Submissions for Procedure Changes that relate to IMO Market Procedures should be submitted to:

Independent Market Operator

Attn: Manager Market Administration
PO Box 7096
Cloisters Square, Perth, WA 6850
Fax: (08) 9254 4399
Email: marketadmin@imowa.com.au

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

LGP supports the proposed changes as significantly enhancing the clarity and coverage of the existing procedure.

We note that further changes to the procedure are envisaged to reflect the new IMO format and the outcomes of the current wider review of the certification process being undertaken by the IMO.

Our only reservation is in regard to the requirement that the Temperature Dependence Curve be specified by the manufacturer in 5 degree intervals. We would suggest that there is sometimes genuinely difficulty in obtaining the temperature dependence curves and that the independent engineering firm should be required to interpolate whatever manufacturers data is reasonably available, be it more closely spaced or otherwise.

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

Subject to our reservation above, LGP considers that the changes are principally administrative and that the clarifications are reasonable. Consequently they have no material bearing on the Market Objectives other than to improve their integrity via improved clarity.

3. 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.

As mentioned above, the 5 degree spacing of the temperature curve is of concern. LGP's temperature curve is specified by the manufacturer every 10 degrees and is independent of temperature throughout the range 10 to 50 degrees. We perceive it to be difficult to obtain spacing of 5 degrees, which would in case presumably just confirm the constant performance.

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

Not applicable.