

Here are Alinta's comments upon PC_2011_03

Clause 1.1 This clause states that this Market Procedure should be read in conjunction with clause **2.29.5M - 2.29.5N** of the Wholesale Electricity Market (WEM) Rules (Market Rules). While these Rules appear in the Procedure Change information provided to the Market Procedures Working Group (at appendix 2), it does not appear that these clauses exist in any existing or proposed Market Rules including RC_2010_29. While it has been asked of the Market Procedures Working Group to limit comment to the Procedure Change, this is difficult due to the introduction of Market Rule changes in the Procedure that Market Participants have not yet had the opportunity to comment upon.

Clause 1.2.3 (b) Again while there is information about new Market Rule changes in Appendix 2 in relation to interruptible loads, the need of the role of associating interruptible loads with a DSP for the transition period is unclear. It is understood by Alinta that interruptible loads will be able to transition to a DSP through the normal registration of DSP facilities process. This process involves the current facility (interruptible load) becoming a a new facility (DSP). Given this, is there any need to refer to an interruptible load in the transitional Procedure Change?

Clause 1.5.2 (c) Should this clause refer to 'Standing' Data Formats rather than 'Standard' Data Formats?

Clause 2.1.5 Is a DSP provider limited to the available options provided by the IMO in its notification (transition plan) under clause 2.1.4? For example, a DSP provider may intend to sign further customers that may require a different Facility size/composition to those proposed as options by the IMO, yet this clause infers that DSP providers do not have the flexibility of selecting alternative options not provided by the IMO in its transition Plan. This may just be a question of interpretation of this current clause, however there would be benefits in further clarifying this clause.

Clause 2.1.6 The five business days that Market Customer's have to review transition plans, assuming that once the size of the DSP is nominated it is locked in for future years, does not provide a sufficient length of time for Market Participants to obtain long-term commercial approval that may be needed. For example, the approval of transition plans may need Board or Senior Management approval due to the longer term Commercial implications of locking in DSP facilities.

Clause 2.3.2 The need for a single line diagram for an associated load which has a generation system behind its associated meter is unclear, particularly where it is obvious that the generation system is small and will not impact the network. While Alinta is aware that the IMO is seeking clarification from System Management as to this requirement, Alinta considers that a more appropriate clause would require that for any **licensed** generation system (>10 MW) behind an associated meter, a Single Line diagram would be compulsorily required to be submitted to the IMO/System Management. Alternatively a Single line diagram could be specifically requested by System Management within the 5 day period under Clause 2.2.12, should a generation system be small and not licensed (i.e <10MW) but System Management considers that it still likely to impact upon the network . Again, the programme/facility would be taken as facilitated by System Management should it not make a decision within 5 business days as under the current wording of Clause 2.2.12. Alinta proposes this amendment because of the onerous obligation that the proposed Procedure places upon DSP providers and its associated non-dispatchable load for small generation systems.

Alinta appreciates that comments upon PC_2011_03 by Market Participants should exclude commentary on RC_2010_29, Alinta considers that this whole process post October 1 2011 favours large DSP aggregators that have small dispatchable loads and are able to over-subscribe their DSM programmes. Given this, Alinta proposes the wider question, related to RC_2010_29 but directly linked to the current Procedure Change is:

are the DSP sizes that we specify then locked in for future capacity years as the facility size, or is there a level of flexibility under the procedure? specifically,

- a. Can we specify different sizes of our DSP during the transition?
- b. Can we specify different DSP sizes in future cycles without paying security but maintaining the total size of all programmes?

It is also unclear as to the definition of the term registration between the RC_2010_29 and PC_2011_03. Does registration of a DSP occur when non-dispatchable loads are associated with it (as per the PC_2011_03) or does registration refer to when DSP is registered? (as per RC_2010_29, proposed clause 4.25A.1 (c))? As it appears that the verification test is on the DSP (which is essentially a placeholder) and is not linked to the association of the loads. It would seem more appropriate that testing is linked to association of loads into the DSP.

Any questions or queries, please do not hesitate to contact me on the details below.

Kind Regards

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