INDEPENDENT MARKET OPERATOR

Procedure Change Report Title: IMS Interface

PC_2012_10 Procedure Change Process



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Executive Summary

Proposed amendments

The proposed amended Market Procedure: IMS Interface (Procedure) has been developed to address a number of minor technical inconsistencies within the Market Procedure and to ensure consistency and clarity between the Market Procedure and any Amending Rules that have commenced since the Procedure was last updated. The amended Procedure specifies the necessary technical details and standards which System Management and the IMO must follow when exchanging information.

Consultation

- The IMO formally submitted the Procedure Change Proposal and issued a notice calling for submissions on 5 November 2012. The submission period closed on 3 December 2012 and no formal submissions were received.
- The IMO notified the IMO Procedure Change and Development Working Group (IMOPWG) on 7 November 2012 that it did not consider that the Procedure Change Proposal required discussion by the IMOPWG. This was because the changes to this Procedure were minor in nature, and consisted only of small changes to be made in addressing minor technical inconsistencies, as identified and agreed to between the IMO and System Management.
- Following the closure of the submission period, the IMO and System Management identified a number of issues with the proposed Procedure. To address these issues, the IMO considered it appropriate to undertake a further informal consultation process to allow interested parties to make submissions on the revised Procedure. The informal consultation period commenced on 4 February 2013 and closed on 18 February 2013. One informal submission was received from Community Electricity.

The IMO's Assessment of the Proposal

The IMO considers that the amended Market Procedure as a whole is consistent with the Wholesale Market Objectives.

The IMO's Decision

The IMO's decision is to accept the amended Market Procedure as modified following the formal submission period.

Next steps

The amended Market Procedure for IMS Interface will commence 22 April 2013.



1. **Procedure Change Process and Timetable**

On 5 November 2012 the Independent Market Operator (IMO) submitted a Procedure Change Proposal regarding amendments to the Market Procedure: IMS Interface (PC_2012_10).

This proposal is being processed using the Procedure Change Process, described under clause 2.10 of the Market Rules.

The key dates in processing this Procedure Change Proposal are:



2. Proposed Amended Market Procedure

2.1. The Procedure Change Proposal

To ensure transparency in the market, the IMO introduced the new Market Procedure for IMS Interface (PC_2012_04). This new Market Procedure commenced in July 2012 and supported the transfer of information between the IMO and System Management by detailing the parameters that the IMO and System Management must use when providing each other information under the Market Rules. Since the introduction of PC_2012_04¹, a number of issues have been raised by both the IMO and System Management and, as a result, the IMO proposes to clarify and amend this Market Procedure to ensure transparency and improve overall integrity, and to address a number of minor technical inconsistencies in the practical implementation of the procedure. The proposed amendments have been developed collaboratively between the IMO and System Management.

For full details of the Procedure Change Proposal please refer to the Market Web Site: <u>http://www.imowa.com.au/PC 2012 10</u>

3. Consultation

3.1. Market Advisory Committee or Working Group

The Market Advisory Committee (MAC) has delegated to the IMO Procedure Change and Development Working Group (IMOPWG) (clause 2.3.17(a)) to consider IMO Procedure Change Proposals and accordingly the MAC has not reviewed this Procedure Change Proposal. However, in accordance with clauses 2.10.8 and 2.10.9 the IMO notified the MAC once the Procedure



¹ For further details refer to the following webpage: <u>http://www.imowa.com.au/PC_2012_04</u>

Change Proposal had been published and noted that it would convene a meeting of the MAC should two or more members request it. No MAC member contacted the IMO in this regard.

The IMO did not consider that the proposed amended Market Procedure required convening the IMOPWG as the proposed amendments were considered minor in nature and were agreed to between the IMO and System Management. As a result the proposed amended Market Procedure was submitted into the formal Procedure Change Process on 5 November 2012. The IMO notified the IMOPWG on 7 November 2012. not

3.2. Public Workshop

No public workshops were held in relation to this Procedure Change Proposal.

Two workshops were held between System Management and the IMO on 13 December 2012 and 14 December 2012. The workshops were held to address several issues that were identified in the amended Procedure post the formal submission period.

3.3. Submissions received during consultation period

The public consultation period for the proposed amended Market Procedure was held between 5 November 2012 and 3 December 2012. No formal submissions were received. Following the closure of the submission period, the IMO and System Management identified a number of issues with the proposed Market Procedure. To address these issues, the IMO considered it appropriate to undertake an additional consultation process to allow interested parties to make submissions on the revised Procedure. The informal consultation period commenced on 4 February 2013 and closed on 18 February 2013. One informal submission was received from Community Electricity. Community Electricity supported the proposal and considered that the proposed amended Market Procedure was consistent with the Wholesale Market Objectives. No costs or practicality of implementation issues were identified by Community Electricity.

A copy of all submissions in full received during the submission period is available on the Market Web Site: <u>http://www.imowa.com.au/PC_2012_10</u>

4. The IMO's assessment

In determining whether to accept the Procedure Change Proposal, the IMO has undertaken an assessment in light of clause 2.9.3(a) of the Market Rules. Market Procedures must be:

- developed, amended or replaced in accordance with the process in the Market Rules;
- consistent with the Wholesale Market Objectives; and
- consistent with the Market Rules, the Electricity Industry Act and Regulations.

4.1. Further changes to the Market Procedure

The IMO notes that following the public and informal consultation processes it has:

- removed proposed changes to the size of some data elements;
- removed proposed changes to the validation requirements for some data elements;
- updated section 4.4, to clarify the requirements for plain text acknowledgement files and specified the use of XML format acknowledgement files for certain interfaces; and



• amended specific interfaces.

The IMO considers that the proposed amended Market Procedure is drafted in a way that does not change the operation or objectives of the Market Rules. As a result, the IMO considers that the amended Procedure, as a whole, is consistent with the Wholesale Market Objectives.

4.2. Wholesale Market Rules, the Electricity Industry Act and Regulations

The IMO considers that the proposed amended Market Procedure is consistent, as a whole, with the Market Rules, the Electricity Industry Act and Regulations.

The IMO also considers that the proposed amended Market Procedure is consistent with all other Market Procedures.

4.3. Implementation of the Market Procedure

The Procedure will not require the IMO or Rule Participants to implement any procedural or system amendments before it can commence. Consequently, the IMO considers that commencement at **8:00 AM on 22 April 2013** will allow Rule Participants sufficient time from the date of publication of this Procedure Change Report to ensure compliance with the amended Procedure.

5. The IMO's decision

The IMO's decision is to approve the amended Market Procedure: IMS Interface as proposed in the Procedure Change Proposal and amended following both formal and informal consultation periods.

The IMO has made its decision on the following basis. The amended Market Procedure: IMS Interface:

- is consistent with the Wholesale Market Objectives;
- is consistent with the Market Rules, Electricity Industry Act and Regulations; and
- has the support of the IMO, System Management and the submissions received during the formal and informal consultation periods.

Additional detail outlining the analysis behind the IMO's reasons is outlined in section 4 of this Procedure Change Report.

6. The Amended Market Procedure

6.1. Commencement

The amended Market Procedure: IMS Interface will commence at 8.00 am on 22 April 2013.

6.2. The Amended Market Procedure

The amended Market Procedure: IMS Interface is attached to this report and is also available on the Market Web Site: <u>http://www.imowa.com.au/PC_2012_10</u>

