

# WHOLESALE ELECTRICITY MARKET

## Submission to Procedure Change Proposal

**AEPC\_2018\_05**

**Market Procedure: IMS Interface**

<b>Submitted by</b>	
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<b>Date submitted:</b>	22 May 2018

### 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**

Table 3 – Information Services

*Transmission network and connection point modelling data and transmission network connection point topology*

Western Power is of the view that the manner AEMO accesses Western Power's Power System Model, as set out in Table 3 of the Market Procedure, is only applicable for the duration of the current Services Agreement. Upon the expiry of the Services Agreement, the manner that AEMO accesses Western Power's Power System Model will no longer be applicable and the Market Procedure will need to be amended.

*Historical SCADA data*

The term 'historical SCADA data' is referred to in Table 3 of the Market Procedure. To provide clarity on the retention period of SCADA data, Western Power is of the view that AEMO should specify the time period that 'historical' refers to.

*Operational telephones*

Western Power will only provide access or connection to its operational voice systems to the extent that it relates to System Management. Western Power will not be able to provide access or connection to its operational voice systems relating to its field or control room conversations.

Western Power is of the view that it should not be obliged to provide AEMO with access to its historical telephone records. Western Power's historical telephone records contain confidential information that is only accessible to Western Power employees. Western Power would like to discuss this matter further with AEMO.

Sections 2.3.1 and 2.3.2 – Provision of data on expiry of services agreement

Western Power acknowledges its data provision obligations under the WEM Rules. However, Western Power is of the view that the obligations under sections 2.3.1 and 2.3.2 of the Market Procedure go beyond Western Power's obligations as a Network Operator under the WEM Rules. As such, Western Power is not required to provide these services under the WEM Rules and the Market Procedure.

Should AEMO require Western Power to carry out these obligations upon the expiry of the current Services Agreement, AEMO and Western Power will need to enter into commercial discussions regarding the provision of these services and outline any arrangements in a separate services agreement. Western Power invites AEMO to discuss this matter further.

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

As noted above, Western Power is of the view that the obligations under sections 2.3.1 and 2.3.2 of the Market Procedure is inconsistent with the WEM Rules as it goes beyond Western Power's obligations as Network Operator under the WEM Rules.

**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.**

In regards to sections 2.3.1 and 2.3.2 of the Market Procedure, Western Power will need to pass on any costs that it incurs in carrying out the obligations to AEMO through a separate commercial agreement between AEMO and Western Power.

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

Western Power has not assessed the time and resources required to carry out the additional services should the obligations under sections 2.3.1 and 2.3.2 of the Market Procedure apply.