

The background of the lower half of the page is a photograph of a wind farm and power lines, overlaid with a semi-transparent blue filter. On the left, several white wind turbines are visible, with their blades extending outwards. On the right, a tall, lattice-structured power line tower stands prominently. The overall scene is set against a clear sky.

**Independent Market Operator**

**Procedure Change Report**

**Title: Amendments to the Market  
Procedure for Meter Data  
Submissions**

**Ref: PC\_2009\_08**

**Date: 25 September 2009**

## CONTENTS

<b>1. INTRODUCTION</b> .....	<b>3</b>
<b>2. THE PROCEDURE CHANGE PROPOSAL</b> .....	<b>3</b>
2.1 Details of the Proposal .....	3
<b>3. PUBLIC CONSULTATION PERIOD</b> .....	<b>4</b>
3.1 Submissions received .....	4
3.1 Additional Amendments.....	4
<b>4. THE IMO'S ASSESSMENT</b> .....	<b>5</b>
4.1 Wholesale Market Objectives .....	5
4.2 Wholesale Market Rules, the Electricity Industry Act and Regulations.....	5
4.3 Views expressed in submissions.....	6
4.3 Implementation of the amended Market Procedure.....	6
4.4 Views of the Market Advisory Committee .....	6
<b>5. THE IMO'S DECISION</b> .....	<b>6</b>
<b>6. THE AMENDED MARKET PROCEDURE</b> .....	<b>7</b>
6.1 Commencement .....	7
6.2 The amended Market Procedure.....	7

## DOCUMENT DETAILS

IMO Notice No.:PC\_2009\_08

Report Title: Procedure Change Report: Amendments to the Market Procedure for Meter Data

Submissions

Release Status: Public

Confidentiality Status: Public domain

Published in accordance with Market Rule 2.10.12

### Independent Market Operator

Level 3, Governor Stirling Tower

197 St George's Terrace, Perth WA 6000

PO Box 7096, Cloisters Square, Perth WA 6850

Tel. (08) 9254 4300

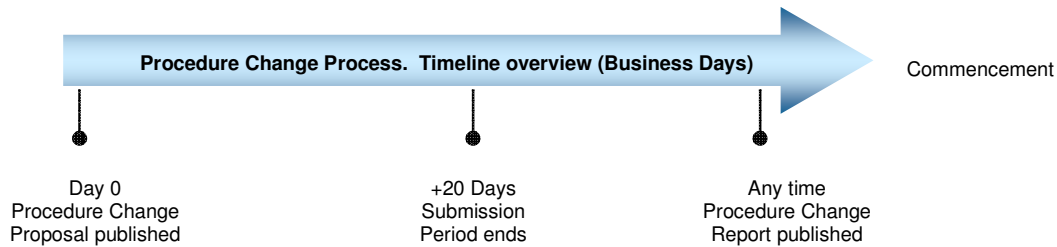
Fax. (08) 9254 4399

Email: [imo@imowa.com.au](mailto:imo@imowa.com.au) Website: [www.imowa.com.au](http://www.imowa.com.au)

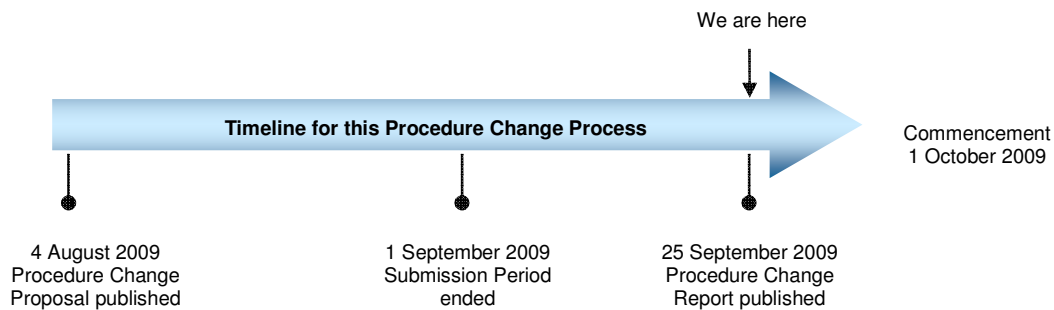


## 1. INTRODUCTION

On 4 August 2009, the Independent Market Operator (IMO) published a Procedure Change Proposal titled “Amendments to the Market Procedure for Meter Data Submissions”. The proposal has been processed according to the Procedure Change Process under clause 2.10 of the Wholesale Electricity Market Rules (Market Rules). This process adheres to the following timelines:



The key dates in processing this Procedure Change Proposal are:



This Procedure Change Report is published by the IMO in accordance with clause 2.10.12 of the Market Rules.

## 2. THE PROCEDURE CHANGE PROPOSAL

### 2.1 Details of the Proposal

Meter Data Submissions are submissions of meter data provided by Metering Data Agents to the IMO on a regular basis in accordance with clause 8.4 of the Wholesale Electricity Market Rules (Market Rules). Meter Data Submissions contain specific information on each meter within the Metering Data Agent's database and on each Trading Interval in a particular Trading Month.

The Rule Change Proposal, “Calculation of IRCR” (RC\_2008\_32), amended the Market Rules with regard to:



- the content of Meter Data Submissions (as set out in clause 8.6.1); and
- the addition of Step 5A in Appendix 5 to bring about a more equitable treatment of non-interval or accumulation meters and interval meters in the calculation of a retailers Individual Reserve Capacity Requirement (IRCR).

The resulting changes to the content of Meter Data Submissions now require additional information to be provided to assist the IMO in approximating the monthly growth of the Notional Wholesale Meter. In particular, the Amending Rules now require the following in Meter Data Submissions:

- the number of non-interval or accumulation meters in existence at the end of any one trading month; and
- the difference between the numbers of newly installed and disconnected non-interval meters in any given trading month

Further details of the Rule Change Proposal are available on the IMO's web page: [http://www.imowa.com.au/RC\\_2008\\_32.html](http://www.imowa.com.au/RC_2008_32.html)

This Procedure Change Proposal seeks to amend the Market Procedure for Meter Data Submissions to:

- improve the process description for submitting Metering Data Submissions, including the format and timing of submissions; and
- ensure consistency with the Amending Rules resulting from RC\_2008\_32 and any other related Market Rule changes that have occurred since this procedure was last updated.

### **3. PUBLIC CONSULTATION PERIOD**

#### **3.1 Submissions received**

The public submission period was between 5 August 2009 and 1 September 2009. The IMO did not receive any submissions.

#### **3.1 Additional Amendments**

During the public submission period the IMO identified a number of minor clarifications required in the Market Procedure for Meter Data Submissions. Due to the minor nature of these clarifications the IMO does not consider that the amendments have a significant impact on the substance of the Market Procedure and therefore further consultation is not required.

The additional amendments to the Market Procedure for Meter Data Submissions are indicated in the updated amended Market Procedure available on the IMO's website.



## 4. THE IMO'S ASSESSMENT

In determining whether to accept the Procedure Change Proposal, the IMO has assessed the Procedure Change Proposal in light of clauses 2.9.3 (a) and 2.10.13 of the Market Rules.

Market Rules 2.9.3.(a) outlines that 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.

Additionally, clause 2.10.13 states that the Procedure Change Report prepared by the IMO must contain the following:

- the wording of the proposed Market Procedure or amendment to or replacement for the Market Procedure;
- the reason for the proposed Market Procedure or amendment to or replacement for the Market Procedure;
- all submissions received before the due date, a summary of those submissions and the response of the IMO or System Management, as applicable, to any issues raised;
- a summary of the views of the Market Advisory Committee (MAC); and
- a proposed date and time for the Market Procedure or amendment to or replacement to commence, which must allow sufficient time, in the IMO's opinion, after the date of publication for Rule Participants to implement changes required by it.

The IMO's assessment is outlined in the following sections.

### 4.1 *Wholesale Market Objectives*

The IMO considers that the steps are drafted in such a way that does not change the operation of objectives of the Market Rules. In particular, the steps described in the proposed amended Market Procedure for Metering Data Submissions covers the process by which a Metering Data Agent submits meter data to the IMO, including the timing and format of submissions, as prescribed in the Market Rules.

As a result the IMO considers that the proposed amended Market Procedure for Meter Data Submission, 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 for Meter Data Submission is consistent as a whole, with the Market Rules, the Electricity Industry Act and Regulations. The



IMO notes that one of the purposes of the proposed amendments was to ensure consistency with the Amending Rules resulting from RC\_2008\_32.

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

#### **4.3 Views expressed in submissions**

The IMO did not receive any submissions on this proposal during the public consultation period.

#### **4.3 Implementation of the amended Market Procedure**

The amended Market Procedure of Meter Data Submissions will not require Rule Participants, the IMO or Metering Data Agents to implement any procedural or system amendments before it can commence. Consequently, the IMO considers that commencement at 8:00am on 1 October 2009 will allow Rule Participants sufficient time from the date of publication of this Procedure Change Report to ensure compliance with the amended Market Procedure.

#### **4.4 Views of the Market Advisory Committee**

The IMO considered the proposed changes to the Market Procedure for Meter Data Submission not to be significant enough to require convening a meeting of the MAC.

After publishing the Procedure Change Proposal, the IMO invited all MAC members to contact the IMO if they considered the proposal to be significant enough to require convening the MAC. No MAC member contacted the IMO in this regard.

## **5. THE IMO'S DECISION**

The IMO's decision is to approve the proposed amended Market Procedure for Meter Data Submissions as proposed in the Procedure Change Proposal.

The IMO has made its decision on the following basis. The amended Market Procedure for Meter Data Submissions:

- is consistent with the Wholesale Market Objectives;
- improves consistency with the Market Rules, Electricity Industry Act and Regulations; and
- requires no system changes prior to implementation.

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 for Meter Data Submissions will commence at 08.00am on 1 October 2009.

### **6.2 The amended Market Procedure**

The wording of the amended Market Procedure for Meter Data Submissions, as proposed by the IMO and updated during the public consultation period, is available on the IMO's website: [http://www.imowa.com.au/PC\\_2009\\_08.html](http://www.imowa.com.au/PC_2009_08.html)