
Wholesale Electricity Market Submission to Procedure Change Proposal

PC_2012_09: Changes to Market Procedure for Determining Loss Factors

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 and IMO Market Procedures should be submitted to:

Independent Market Operator

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

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

Community is a member of the IMO's Procedure Change Working Group. We support the Procedure Change Proposal on the grounds that it has been co-developed by the IMO and Western Power, clarifies the process and is consistent with the Market Rules.

We make the following minor suggestions:

- i) There are several phrases to the effect of “as soon as practicable but before the information is required....” (for example 2.2.1, 2.1.2 and 2.3.1). We suggest that the requirement be shortened to ‘as soon as practicable’ as to require otherwise is to mandate something that is impractical, and clause 2.5 (Failure to Provide Loss Factors) seems to accommodate non performance.
 - ii) Clause 2.4 requires a Market Participant to act expeditiously and comply with the specified timelines if it wishes to seek a reassessment. We suggest that it should be permitted to do this at anytime and should have a period longer than 2 days to decide whether it wishes to pay for an audit (2.4.9).
 - iii) Clause 4.1.3 appears to have omitted the word “connection” as in transmission *connection*.
 - iv) In clause 4.1.11 we suggest include a check that a reasonable number of data points have been omitted in clause 4.1.7, and if not, mandate a remedy of the underlying cause.
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2. Please provide an assessment whether the Procedure Change Proposal is consistent with the Market Objectives and the Wholesale Electricity Market Amending Rules.

Community considers the proposal to be consistent with all the Market Objectives.

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.

The proposal has no implications for Community.

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

Not Applicable