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## Wholesale Electricity Market – Submission to Procedure Change Proposal

### PPCL0004

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### Revised PSOP: Ancillary Services

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#### Submitted by

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<b>Organisation:</b>	Landfill Gas and Power
<b>Address:</b>	
<b>Date submitted:</b>	12.2.09

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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 should be submitted to:

##### **Western Power Networks - System Management Division**

Attn: Alistair Butcher, Market Strategic Development Manager  
GPO Box L921  
Perth WA 6842  
Fax: (08) 9427 4228  
Email: [market.development@westernpower.com.au](mailto:market.development@westernpower.com.au)

Submissions for Procedure Changes that relate to IMO Market Procedures should be submitted to:

##### **Independent Market Operator**

Attn: Manager Market Administration  
PO Box 7096  
Cloisters Square, Perth, WA 6850

Fax: (08) 9254 4399  
Email: marketadmin@imowa.com.au

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

LGP accepts in good faith System Management's statement that the amended procedure represents both a consensus outcome of the System Management Power System Operation Procedure Working Group (constituted under the auspices of the MAC) and is consistent with the Market objectives.

However, we also note that the supporting documentation for the Procedure Change Proposal gives no indication of the specific changes made or the reasons for them. Instead, a replacement procedure is specified and the documentation is silent on the outgoing procedure. On this basis, we suggest that the format is not conducive to broader consultation and the legitimacy of the consultation process is constrained. In particular, it is inappropriately difficult to discern the procedure itself from the changes supposedly under review. We suggest that a more practicable format would follow more closely that of the market Rule Change process.

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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.**

LGP accepts in good faith System Management's statement that that the amended procedure represents both a consensus outcome of the System Management Power System Operation Procedure Working Group (constituted under the auspices of the MAC) and is consistent with the Market objectives.

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**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 procedure change will not impact adversely on LGP.

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

LGP could implement the changes immediately.