

# Wholesale Electricity Market – Submission to Procedure Change Proposal

**Procedure Change: PPCL0014** 

**Power System Operation Procedure: Dispatch** 

## 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 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

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



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

LGP supports the procedure change proposal on the grounds that it seeks to correct an oversight in a recently instituted procedure change that would otherwise place unreasonable restrictions on Market Participants and unreasonable monitoring obligations on System Management.

LGP is not itself impacted by the proposal and accepts in good faith the nominated 6MW per hour average ramp rate and the practicality of the 1 minute generation profile.

We perceive that in clause 13.1.2 the ramping limit should be stated as 6MW per hour.

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

LGP considers that the amended procedure is consistent with the Market objectives as it preserves the original intent while improving practicality and giving market participants more flexibility.

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.

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.