

PPCL0016

Revised PSOP: Commissioning and Testing

Submitted by

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Date submitted:	13.1.11

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 is a member of System Managements Procedure Review Committee and supports the general thrust of the proposed changes.

We offer the following comments:

- Throughout the document there are references in separate contexts to Contact Details, Communications Protocols, and a Market Participant's obligation to comply with them. We suggest state this only once in a section entitled "Communications". Examples of clauses that should be subsumed by the new clause include clauses 5.1.3; 5.5.2; 5.5.3; 5.6.4; 5.6.5; 5.6.6.
- ii) As clause 5.1.3 currently stands, how is a Market Participant required to make the initial contact?
- iii) Suggest delete "when required" in clause 5.1.5.
- iv) Suggest clarify clause 5.1.6 does the '2 days' apply to the granting of approval or is it a deadline for submission for consideration by SM?
- v) Suggest review the punctuation and sense of 5.3.3.
- vi) Suggest clause 5.3.4 should refer to a "relevant change"
- 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 the proposal to be consistent with the Market Objectives and Amending Rules.

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.

LGP is not affected by the Procedures Changes.

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

Not applicable.