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## Wholesale Electricity Market – Submission to Procedure Change Proposal

Procedure Change: PPCL0019

Power System Operation Procedure: Monitoring and Reporting Protocol

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### Submitted by

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<b>Address:</b>	
<b>Date submitted:</b>	8.4.11

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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](mailto: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 supports the procedure change proposal on the grounds that it improves and clarifies the existing procedure conditional on consideration of the following comments.

We consider that the proposed changes would benefit from an editorial read-through to improve the logical flow and consistency. In particular:

1. Clause 5.3.2 should better distinguish between the “real time Tolerance Range” and the “ex post Tolerance Range” (noting the use of the lower case (undefined) terms). The procedure should also indicate somewhere why this is necessary.
2. Clause 5.2.5 provides that if System Management believes that a Tolerance Range is unsuitable, then a (emphasis added) Market participant must apply to System Management for it to be changed. Having regard to the fact that System Management itself set the offending Tolerance Level and then went through the public consultation process to confirm it, the sense and intent of this is unclear.
3. Clause 5.2.7 appears to say that System Management must consult with all Market Participants prior to determining a Tolerance Level for a single facility. Is this the intent?
4. Clauses 5.2.8 and 5.2.9 appear to duplicate clauses 5.2.3 and 4.2.4.
5. Clause 5.2.10 should be integrated with clause 5.2.2 to the extent that it duplicates it.

While not part of the Rule Change proposal, we would also suggest consideration of the original procedure as follows:

6. Clause 5.3 should specify that only Market Rules requiring monitoring by System Management are listed in the Table. That said, Ideally, this clause would be integrated with clause 5.2 and 5.2's reference to priority included as new clause 2.4.
7. Please clarify whether clause 5.4.3 applies only to EGC or to all participants.

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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 considers that the amended procedure is consistent with the Market objectives as it manifests the Market Rules more clearly.

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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.