

# WHOLESALE ELECTRICITY MARKET

## Submission to Procedure Change Proposal

AEPC\_2017\_10  
PSOP: Dispatch

<b>Submitted by</b>	
<b>Name:</b>	Angelina Cox
<b>Phone:</b>	(08) 6282 7459
<b>Fax:</b>	N/A
<b>Email:</b>	angelina.cox@synergy.net.au
<b>Organisation:</b>	Electricity Generation and Retail Corporation trading as Synergy
<b>Address:</b>	Forrest Centre, 219 St Georges Terrace Perth 6000
<b>Date submitted:</b>	18 August 2017

### Submission

Clause 2.10.7 of the Wholesale Electricity Market Rules provides that any person may make a submission for a Procedure Change Proposal (including proposals developed by AEMO, the Economic Regulation Authority or the Rule Change Panel) by completing this Procedure Change Submission form.

Submissions should be provided by email to the nominated contact in the call for submissions published with the Procedure Change Proposal.

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

Electricity Generation and Retail Corporation trading as Synergy (**Synergy**) welcomes the opportunity to provide feedback to the Australian Energy Market Operator (**AEMO**) on its Procedure Change Proposal: Dispatch.

In reviewing this Procedure Change Proposal, Synergy has identified the following issues for AEMO's further consideration:

1. **Step 5.1.4** states: *"if a market Participant receives a Dispatch Instruction...and becomes aware that its forecasted assumption profile is no longer a reasonable forecast...for the relevant trading interval, then it must notify AEMO by **phone or as agreed** between the parties..."*

**Clause 7.7.6C** of the WEM Rules (gazetted by the Minister on 31 May 2016) is silent in regards to the form of notification and states that *"a Market Participant must notify System Management as soon as reasonably practicable of a revised good faith forecast of the DSP's likely consumption profile."*

To avoid inconsistency in communication, Synergy would like to propose either:

- To remove the words *"as agreed between parties"* in step 5.1.4 of this Procedure and keep notification by phone as the only option; or
  - Specify other acceptable means of communication to clarify term *as agreed*.
2. **Step 6.2.3** states: *"If in opinion of AEMO, a Facility providing LFAS is **not adequately** complying with its performance requirements, AEMO should investigate the reasons..."*

Synergy would like to request AEMO to define the term *not adequately*.

3. **Step 7.6:** Synergy would like to seek clarification in regards to the ramp rate used for the calculation of the amount in MWh by which the Facility was requested to decrease its consumption.

**Clause 7.13.5(a)** of the WEM Rules can be interpreted as though the Dispatch Instruction can request a ramp rate.

Synergy would like to enquire whether the ramp rate in a Dispatch Instruction for a non-balancing facility must match the ramp rate in the Standing Data, or if it is able to differ to the Standing Data. If the ramp rate that is requested within a Dispatch Instruction can be higher or lower than the ramp rate in the Standing Data, than **step 7.6.1(a)** and **7.6.1(b)** of the Procedure need to be amended to use the ramp rate in the Dispatch Instruction, rather than the ramp rate in the Standing Data.

4. The Procedure will require further amendments to incorporate the Generator Interim Access scheme (GIA) provisions. Synergy appreciates that AEMO is still working on the best way to include Dispatch Instructions and Orders in the GIA.

In addition to this, Synergy has identified the following minor issues AEMO's further consideration:

5. There appears to be some inconsistency in the use of footnote references and in text explanation notes. Suggest applying same approach throughout the whole document to avoid confusion.
6. Synergy would like to suggest rephrasing the references to the WEM Rules in the following sections, so the Procedure reads better:

**Section 2.2.1:** *"When scheduling and dispatching Market Participants' Facilities, AEMO must at all times seek to meet the criteria described in ~~the WEM Rules~~ **[MR Clause 7.6.1]** of the WEM Rules."*

**Section 3.1.6:** *"Communication of, and consultation in relation to, the information referred to in ~~the WEM Rules~~ **[Clause 7.6A.2(c)]** of the WEM Rules....."*

**Section 4.6.1:** *"AEMO must determine the estimated Ancillary Service requirements for each Market Participant that is a provider of Ancillary Services in accordance with ~~the WEM Rules~~ **[Clause 7.2.3A]** of the WEM Rules."*

**Section 4.8.1:** *"AEMO may request a Market Participant to provide a relevant recent consumption history including the current consumption ~~[Clause 7.6.10A]~~ in a manner ~~agreed between the parties~~ described in Clause 7.6.10A of the WEM Rules...."*

Synergy suggests that similar approach could be taken in Sections 4.9.1, 4.10.1, 4.11.3 and throughout the document.

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

Synergy considers that the Proposal is consistent with the Wholesale Electricity Market Objectives.

**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.**

Synergy does not anticipate any significant costs associated in implementing the Procedure Change Proposal.

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

Synergy does not require any significant time commitment to implement the Procedure Change Proposal.