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## Wholesale Electricity Market – Submission to Procedure Change Proposal

### PPCL0013 Power System Operation Procedure: Dispatch

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#### Submitted by

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<b>Date submitted:</b>	17 September 2009

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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 Development & System Capacity  
PO Box 7096  
Cloisters Square, Perth, WA 6850  
Fax: (08) 9254 4399  
Email: [market.development@imowa.com.au](mailto:market.development@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 proposal. We offer the following minor and typographical suggestions:

8.0.2 “should endeavour” needs to be defined; either they should be required to, or should not. Perhaps SM could be required to log the issue.

8.2.1 The subject of “via SMMTS.....” needs to be changed; suggest put the MR reference at the end.

8.3.3 Suggest improve the sense of the first sentence; it seems to have been mangled.

10.5 Suggest review the appropriateness of a party seeking an arbitration to make a submission on behalf of the other party.

11.2.1 Suggest delete “using a forecasting methodology” as it is self evident.

11.10. 1 and 11,10.3 Suggest consider removing the references to the Spinning Reserve quantities as they are under review and it is desirable to avoid having to change the Procedure is the MR is changed.

13.4 Suggest clarify the meaning of “...but it will be for the purpose of.....”

13.5 Suggest clarify the meaning of “in the event..... direction”

13.8 the two criteria should be satisfied rather than be satisfied by the Generating facility itself.

13.10.3 Suggest review the reasonableness of this; does it say that SM is not responsible for its mistakes in this regard?

LGP also supports the IMO’s proposed extension of the “2 days” in 10.5 Step 8 to 10 days as being more practicable.

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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 the proposal to implement the Markey Rules and as such is consistent with all of them.

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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.**

None

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

Not Applicable

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