
Wholesale Electricity Market – Submission to Procedure Change Proposal

Procedure Change: PPCL0018

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 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. The clause labels in clause 13.1 appear to duplicate following clauses.
2. Clause 13.1 part 1 needs to emphasize that the interpolation applies to each Trading Interval.
3. In clause 13.1.1.1, suggest delete the word “may” and replace it by words to the effect of, “If the Market Participant wishes to submit a Demand Profile, it must do so by 3pm...”
4. Clause 13.1.5 appears to say that despite a participant having lodged a Demand Profile, System Management can ignore it and use the interpolation method that is intended to apply as a default if they don't lodge either a Demand profile or an Algorithm. Is this the intent, and if so, it seems unreasonable or in need of justification?
5. Clause 13.1.2.1 refers to times of Synchronisation and Re-synchronisation, but not to De-synchronisation – should it?
6. Clause 13.1.2.5. In similar vein to point 4 above, this appears to say that despite a participant having lodged an Algorithm, System Management can ignore it and use the interpolation method that is intended to apply as a default if they don't lodge either a Demand profile or an Algorithm. Is this the intent, and if so, it seems unreasonable or in need of justification?

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.

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.