### WHOLESALE ELECTRICITY MARKET

#### **Submission to Procedure Change Proposal**

#### AEPC\_2018\_04

Power System Operation Procedure: Facility Outages

Submitted by	
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#### 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

While Western Power supports the changes set out in the Procedure Change Proposal, section 5.1.2 of the PSOP sets different timing requirements for AEMO in its evaluation of Outage Plans submitted by Market Generators and Network Operators. AEMO must use reasonable endeavours to evaluate an Outage Plan within 10 Business Days for generator outages, and within 20 Business Days for Network Outages. Western Power understands that Network Outages may involve complexities and require a longer evaluation period than generator outages.

Western Power is of the view that the different timing requirements may disadvantage Network Operators and may prevent AEMO from evaluating Outage Plans on a "first come first served" basis. For example there may be instances where, due to time constraints, AEMO may evaluate and accept a generator outage prior to evaluating a Network Outage even though the Network Outage was submitted prior to the generator outage.

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

The Procedure Change Proposal appears to be consistent with the Market Objectives and the Wholesale Electricity Market Rules.

# 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 Proposal appears to have no current implications on Western Power. However, section 3.1.1 of the PSOP allows AEMO to nominate an IT system for the communication of outage information. Should this occur, Western Power would need to consider the implications of the new IT system to its business if AEMO changes its nominated IT system from System Management's Market Information Technology System (SMMITS) to another IT system in the future.

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

While the current Procedure Change Proposal does not require any specific changes, Western Power understands that AEMO will be reviewing other PSOPs and guidelines that will require Western Power's ongoing consideration.