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**Wholesale Electricity Market – Submission to Procedure Change  
Proposal PC\_2009\_11 Market Procedure for Undertaking the Long  
Term PASA and Conducting a Review of the Planning Criterion**

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**Submitted by**

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<b>Date submitted:</b>	2 February 2010

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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 and 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

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

In general, Synergy supports Procedure Change Proposal PC\_2009\_11, which establishes the *Market Procedure for: Undertaking the Long Term PASA and Conducting a Review of the Planning Criterion (Market Procedure)*. The Market Procedure outlines the steps by which the IMO must prepare the Long Term Projected Assessment of System Adequacy (**PASA**), the Statement of Opportunities Report (**SOO**) and the review required under clause 4.5.15 of the Market Rules pertaining to planning criterion and the process for forecasting peak demand.

However, Synergy believes that the way the Market Procedure requires some of the information to be presented in the SOO is inconsistent with the Market Rules.

Section 4.5.13 of the Market Rules clearly states that the SOO must include, amongst other things, *the input information assembled by the IMO in performing the Long Term PASA study including, for each Capacity Year of the Long Term PASA Study Horizon:*

- i. the demand growth scenarios used;*
- ii. the generation capacities of **each** generation Registered Facility;*
- iii. the generation capacities of **each** committed generation project;*
- iv. the generation capacities of **each** probable generation project;*

Clearly, the intent of Market Rule 4.5.13 is for the IMO to provide, to the market, separate generation capacities for individual generation facilities. Whilst the Market Procedure replicates this requirement in step 2.10.2(a), step 2.10.3 states that for the purposes of step 2.10.2, the IMO may publish **aggregated** information in the SOO.

Synergy argues that the provision of merely aggregate generation capacity information in the SOO does not meet the express intent of the Market Rules. For this reason, Synergy objects to step 2.10.3 and contends that it should be removed from the Market Procedure.

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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.**

Synergy believes that the Procedure Change Proposal will be consistent with the Market Rules, and hence the Market Objectives, upon removal of step 2.10.3 of the Market Procedure. The Market Rules require that the IMO publish separate generation capacities for generation facilities, not, as stated in step 2.10.3, an aggregate value.

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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.**

Synergy would not require any changes to IT or business systems, nor incur any organisational costs, as a consequence of adopting the Market Procedure.

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

Synergy would be able to implement this Market Procedure immediately.

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