

---

---

**PPCL0017**

**Facility Outages**

---

---

**Submitted by**

<b>Name:</b>	Graeme Alford
<b>Phone:</b>	08 9475 0144
<b>Fax:</b>	08 9475 0173
<b>Email:</b>	<a href="mailto:graeme.alford@landfillgas.com.au">graeme.alford@landfillgas.com.au</a>
<b>Organisation:</b>	Landfill Gas and Power
<b>Address:</b>	
<b>Date submitted:</b>	13.1.11

---

---

**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 Administration  
PO Box 7096  
Cloisters Square, Perth, WA 6850  
Fax: (08) 9254 4399  
Email: [marketadmin@imowa.com.au](mailto:marketadmin@imowa.com.au)

---

---

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

LGP is a member of System Managements Procedure Review Committee and supports the general thrust of the proposed changes.

We offer the following comments:

- i) Throughout the document there are several references in separate contexts to System Management being required to communicate with Market Participants in a particular manner or “or as otherwise directed”. An example is clause 11.2. Presumably SM is the party that would be issuing the direction, in which case this phrase would seem to be redundant.
- ii) Throughout the document there are several references to System Management advising its contact details from time to time. Examples include clauses 6.2, 12.2, 14.2 and 15.2. We suggest specifying how this notification is to be made as otherwise it is unclear how a Market Participant may initiate contact.
- iii) Clause 5.1.2 is ambiguous; it is unclear as to whether it is the equipment list that is to be maintained from time to time or whether equipment is eligible to be included on the list only if it is in need of maintenance from time to time.
- iv) Clause 11.1. Suggest delete the first sentence and generally review the grammar and sense of the remaining paragraph.

---

**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 be consistent with the Market Objectives and Amending Rules.

---

**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.**

LGP is not affected by the Procedures Changes.

---

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

Not applicable.