



INDEPENDENT
MARKET
OPERATOR

Wholesale Electricity Market Submission to Procedure Change Proposal

PPCL0025: Revised PSOP – Commissioning and Testing

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 and IMO Market Procedures should be submitted to:

Independent Market Operator

Attn: Group Manager, Market Development
PO Box 7096
Cloisters Square, Perth, WA 6850
Fax: (08) 9254 4399
Email: market.development@imowa.com.au



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

Background

System Management proposes a number of changes to the Power System Operation Procedure (PSOP): Commissioning and Testing to implement the following recently commenced Rule Change Proposals:

- RC_2012_12 - Updates to Commissioning Test Plans; and
- RC_2012_15 - Four month Commissioning Test Period for New Generating Systems.

Alinta's views

Alinta has reviewed System Management's proposed amendments to the PSOP. While we are not in a position to comment on the appropriateness of the proposed revisions to differentiate between the requirements for Load Following and Spinning Reserve during commissioning, we offer the following points for System Management's further consideration:

- Step 2.1.3 – The obligation to report a potential breach of the timing requirement for applying for a commissioning test through to the IMO appears to be no longer relevant given the changes to clause 3.21A.4 that were implemented by the Amending Rules from RC_2012_12¹. Additionally System Management no longer has an indirect requirement under clause 2.13.9(gA) to monitor compliance with clause 3.21A.4 as a result of the amendments to clause 3.21A.2 (a Civil Penalty provision for which System Management is required to monitor compliance). That is clause 3.21A.2 no longer makes reference to the timing requirements under clause 3.21A.4, but rather simply requires that any commissioning activities are undertaken in accordance with an approved Commissioning Test Plan.

More broadly, System Management's comments (provided in the relevant comment box) don't appear to reflect the less rigid requirements for applying for a Commissioning Test Plan to be approved that were intended by RC_2012_12. For example the new rules do not preclude a generator applying for a Commissioning Test Plan to be approved within a shorter time period; this is particularly relevant where a participant is seeking a revision to an already approved Commissioning Test Plan.

The intent of RC_2012_12 was to enable more flexibility to generators when undertaking commissioning activities. In particular it was intended that generators should be able to seek a revision to Commissioning Test Plan where additional time was required to complete the relevant tasks or if additional tests were required. This enhanced flexibility does not seem to have been reflected in the proposed revised PSOP.

¹ The timing requirement under clause 3.21A.4 is now a "best endeavours" requirement to provide a request for approval of a Commissioning Test Plan at least 7 Trading Days prior to the Commissioning Test Period. System Management may reject a Commissioning Test Plan if it has not had sufficient time to consider the plan (clause 3.21A.7(d)). This differs from the previous requirement that a participant must request a test at least 20 Business Days in advance which also happened to be a civil penalty provision.

Alinta requests System Management to confirm that there is sufficient flexibility to approve Commissioning Tests Plans (including any revisions to existing plans) provided under the PSOP so as to implement the intended changes from RC_2012_12.

- Step 2.1.4 – Related to the comments provided above, it is unclear that there is sufficient heads of power provided under the Market Rules for System Management to incorporate a requirement to not approve any Commissioning Test Plans received less than 2 days prior to the commencement date of the tests. The proposed 2 day requirement is also inconsistent with the statement made by the IMO in the Draft Rule Change Report that there may be circumstances where it is appropriate for System Management to approve a test received within 2 days of its commencement.

Alinta suggests that System Management confirms whether this restriction on its ability to approve plans, particularly any revised plans, is consistent with the Amending Rules implemented by RC_2012_12.

- Step 2.3.6 – The reference should be to MR3.21A.10(a)(ii) and (iii).
- Step 2.4.2(b) – The references should be to the “most recently approved Commissioning Test Plan” to ensure any revisions are taken into account. This will also ensure consistency with the new terminology of clause 3.21A.13.
- Step 2.4.2(b)(iii) - System Management should confirm that this requirement to submit a new Commissioning Test Plan is consistent with the revised definition of a Commissioning Test Plan under the rules (i.e. includes both an existing and revised Commissioning Test Plan) and more broadly the intention that revisions to plans could be requested by participants.

More generally Alinta suggests that the final drafting of clause 3.21A.13(b) of the Market Rules has created some confusion as whether there can be revisions to extend the timeframes of an already approved Commissioning Test Plans and might benefit from further refinement.

- Step 2.5.1 – The wording of this step should reflect the revised definition of a Commissioning Test provided under clause 3.21A.1 of the Market Rules, i.e. that it is a “series of activities...” More broadly the revised definition of Commissioning Test should be applied across the entire PSOP to ensure consistency.