

WA Independent Market Operator

Assessment of the IMO's internal procedures and business processes with the Market Rules, and the IMO's compliance with the Market Rules and Market Procedures

25 September 2007

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FOREWORD

This report sets out the results of the market audit by PA Consulting Group in carrying out its assessment of the compliance of the IMO's internal procedures and business processes with the Market Rules, and the IMO's compliance with the Market Rules and Market Procedures.

This market audit has been carried out under Market Rule 2.14.3. which requires that

The IMO must ensure that the Market Auditor carries out the audits of such matters as the IMO considers appropriate, which must include:

- (a) the compliance of the IMO's internal procedures and business processes with the Market Rules
- (b) the IMO's compliance with the Market Rules and Market Procedures
- (c) the IMO's market software systems and processes for software management.

PA has found that the IMO has complied with its obligations under the Market Rules, with a small number of instances of non-compliance none of which we believe to be material.

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1. INTRODUCTION

The document sets out the results of the market audit by PA Consulting Group in carrying out its assessment of the compliance of the IMO's internal procedures and business processes with the Market Rules, and the IMO's compliance with the Market Rules and Market Procedures.

1.1 SCOPE OF THE MARKET AUDIT

This market audit has been carried out under Market Rule 2.14.3. which requires that

The IMO must ensure that the Market Auditor carries out the audits of such matters as the IMO considers appropriate, which must include:

- (a) the compliance of the IMO's internal procedures and business processes with the Market Rules
- (b) the IMO's compliance with the Market Rules and Market Procedures
- (c) the IMO's market software systems and processes for software management.

1.2 MARKET AUDIT PROCESS

In conducting the market audit on the compliance of the IMO with the Market Rules, PA has:

- Ensured that it is up to date with its understanding of the Western Australian Wholesale Electricity Market Rules;
- Identified all obligations placed on the IMO by the Market Rules;
- Mapped those obligations to the applicable Market Procedures and Internal Procedures;
- Reviewed the procedures in place for compliance with the Market Rules;
- Sought evidence that the IMO is following those procedures so as to comply with the Market Rules;
- Had discussions with IMO management and staff to clarify issues identified; and then
- Prepared a draft report setting out our findings.

There are limitations to any external audit. Audits are not an absolute guarantee of the truth or reliability of agency information or the effectiveness of internal controls. They may not identify all matters of significance. This is because external audit techniques involve:

- Professional judgement as to "good industry and market operational practice"
- The use of sample testing
- An assessment of the effectiveness of internal control structures and
- An assessment of risk.

A market audit does not guarantee every procedure and action carried out in the operation of the electricity market in the audit report, nor does it examine all evidence and every transaction. However, our audit procedures should identify errors or omissions significant enough to adversely affect the decisions of users of the market audit report.

We also note that there is a high degree of compliance monitoring built into the market design. Should the IMO not carry out a requirement of the Market Rules, those cases that are material will have affected either System Management or market participants and are likely to have been raised.

Where non-compliant procedures or actions are identified, these are classified as being:

- *Material*, in that they may affect decisions made by market participants or otherwise affect the outcome of the market, or
- *Non-material*, in that
 - they do not comply with the wording or the Market Rules but do comply with the intention of the Market Rules or
 - they do not comply with the Market Rules but they are not likely to affect decisions made by market participants or otherwise affect the outcome of the market.

In performing this market audit, we are conscious that it covers the first year of operation of the Western Australian Wholesale Electricity Market. It has been PA's experience that during the first year of operation any electricity market will require some minor changes to the Market Rules to correct problems created by drafting that does not allow reasonable operational practices.

We have found this to be the case here and many of the reported non-compliances are due as much to minor drafting errors, with the spirit of the rule being complied with although the wording is not. Where this has been the case, we have suggested that a Rule Change be proposed to better express the intent of the rule.

1.3 STRUCTURE OF THIS REPORT

The report contains PA's analysis of the operation of the IMO on a Market Rules chapter by chapter basis.

Appendix A to the report records the mapping of Market Rule obligations to both the Market Procedures and the appropriate IMO Internal Procedures although the rules require the audit of compliance of the Internal Procedures and not the Market Procedures with the Market Rules.

1.4 ACKNOWLEDGEMENTS

PA would like to thank the managers and staff of the IMO who willingly provided information and shared in discussion with us while we carried out this market audit.

2. MARKET RULE CHAPTER 1 – INTRODUCTION

2.1 DOCUMENTATION

Market Rule Chapter 1 sets out the Introduction to the Market Rules such as the objectives of the market, conventions and transitional arrangements

The relevant Market Procedures are:

- Market Procedure for Notices and Communications

and there are no Internal Procedures.

2.2 COMPLIANCE WITH CHAPTER 1

The procedures to be followed are fully documented and, if followed, should result in compliance with the Market Rules.

There is only one specific obligation placed on the IMO under Chapter 1 which is the responsibility of the IMO in its Market Administration Role. This obligation under 1.6.1 is that

The IMO must develop a Market Procedure which sets out the method by which notices and communications required under, contemplated by or relating to, these Market Rules are to be given to or by the IMO.

This obligation has been complied with through the publishing of “Market Procedure for Notices and Communications” on the IMO website.

2.3 OPINION

The IMO has complied with its obligations under Chapter 1 of the Market Rules.

3. MARKET RULE CHAPTER 2 – ADMINISTRATION

3.1 DOCUMENTATION

Market Rule Chapter 2 sets out the Functions and Governance Rules, most of which are the responsibility of the IMO in its Market Administration role. The relevant Market Procedures are:

- Administration procedure
- Facility Registration Procedure
- IT Interface Procedure - System Overview and Requirements
- Loss Factor Procedure
- Monitoring Protocol
- Participant Registration Procedure
- Prudential Requirements Procedure
- Rule Change Process

and the relevant IMO Internal Procedures are:

- Internal Procedure: Annual Review of MAC Composition
- Internal Procedure: Rule Change Process
- Internal Procedure: Changing a Market Procedure
- Internal Procedure: Compliance Monitoring, Investigation & Enforcement
- Internal Procedure: Fees
- Internal Procedure: Market Surveillance
- Internal Procedure: Disputes
- Internal Procedure: Determination of IMO Budget
- Internal Procedure: Loss Factors
- Internal Procedure: Prudential Requirements
- Internal Procedure: Handling Guarantees and Bank Undertakings, and Security Deposits
- Internal Procedure: Change Management Procedure
- Internal Procedure: IMO Change Management and Testing
- Internal Procedure: IMO System Restart Testing.

3.2 COMPLIANCE WITH CHAPTER 2

Chapter 2 of the Market Rules deals:

- Firstly, with the establishment of the market and the registration, etc. of the participants and then
- Secondly, with the on-going administration of the market.

The procedures to be followed are fully documented and, if followed, should result in compliance with the Market Rules.

3.2.1 Establishment of the market

We have examined the actions of the IMO in establishing the market and in registering participants and found that when establishing the market and registering participants, the IMO has complied with the relevant requirements of Chapter 2 of the Market Rules.

3.2.2 On-going administration of the market

We have examined the actions of the IMO in the on-going administration of the market and found that the IMO has complied with the relevant requirements of Chapter 2 of the Market Rules.

3.3 OPINION

As far as we have been able to determine, the IMO has complied with its obligations under Chapter 2 of the Market Rules.

4. MARKET RULE CHAPTER 3 – POWER SYSTEM SECURITY AND RELIABILITY

4.1 DOCUMENTATION

Market Rule Chapter 3 sets out the Power System Security and Reliability Rules which are the responsibility of the IMO in its Market Administration role. There are no relevant Market Procedures and the relevant IMO Internal Procedures are:

- Internal Procedure: Ancillary Services Requirements
- Internal Procedure: Outage Compensation Payments
- Internal Procedure: Investigation of Incidents (clause 3.8).

4.2 COMPLIANCE WITH CHAPTER 3

The IMO functions in the energy market fall into those of:

- Auditing System Management’s ancillary services requirements
- Determining the amount of any compensation arising from the deferral or cancellation of a maintenance outage
- Investigating incidents and
- Publishing required information.

The procedures to be followed are fully documented and, if followed, should result in compliance with the Market Rules.

4.2.1 Auditing System Management’s ancillary services requirements

System Management’s Ancillary Services Requirements Report for 2007 has been published on the IMO website. This may be considered as constituting approval by the IMO.

4.2.2 Outage compensation payments

The procedure to be followed is fully documented and, if followed, will ensure compliance with the Market Rules.

There have been no such claims for outage compensation to date.

4.2.3 Investigating SWIS incidents

The procedure to be followed is fully documented and, if followed, will ensure compliance with the Market Rules.

There have been no such incidents requiring investigation to date.

4.2.4 Publishing required information

The IMO is required to publish:

4. Market Rule Chapter 3 – Power system security and reliability. . .

- Ancillary services requirements
- Short and medium term PASA outcomes and
- A list of plant that must have outages approved.

All such reports have been posted on the IMO web site.

4.3 OPINION

As far as we have been able to determine, the IMO has complied with its obligations under Chapter 3 of the Market Rules.

5. MARKET RULE CHAPTER 4 – RESERVE CAPACITY

5.1 DOCUMENTATION

Market Rule Chapter 4 sets out the Reserve Capacity Rules which are the responsibility of the IMO in its System Capacity role. The relevant Market Procedures are

- Market Procedure for Certification of Reserve Capacity
- Market Procedure for Reserve Capacity Performance Monitoring
- Market Procedure for Reserve Capacity Testing
- Market Procedure for Treatment of New Small Generators

and the relevant IMO Internal Procedures are:

- Internal Procedure: SC 01 - Determination of Maximum Reserve Capacity Price
- Internal Procedure: SC 02 - Calling for EOIs for New Capacity - Master
- Internal Procedure: SC 03 - Processing of EOIs for New Capacity - Master
- Internal Procedure: SC 04 - Statement of Opportunities Report - Master
- Internal Procedure: SC 05 - Reserve Capacity Information Pack - Master
- Internal Procedure: SC 06 - Certification of Facilities - Master
- Internal Procedure: SC 08 - Assignment of Capacity Credits - Master
- Internal Procedure: SC 11 - Performance Monitoring - Master
- Internal Procedure: SC 12 - Initial IRCR
- Internal Procedure: SC 13 - Monthly IRCR - Master
- Internal Procedure: SC 15 - Bilateral Trade Declarations - Master
- Internal Procedure: SC 16 - Supplementary Reserve Capacity
- Internal Procedure: SC 17 - Capacity Credits and Obligations - Master
- Internal Procedure: SC 18 - SC WEMS Procedures
- Internal Procedure: SC 19 - Forecasting and Reliability Procedure - Master
- Internal Procedure: SC 20 - Treatment of New Small Generators - Master

The internal procedures consist of process steps which contain both instructions to the user and stages that require “sign-off” by the user and/or manager. The procedures to be followed are fully documented and, if followed, will ensure compliance with the Market Rules.

5.2 COMPLIANCE WITH CHAPTER 4

The Reserve Capacity obligations cover a number of functions:

- The Reserve Capacity Cycle

- The Individual Reserve Capacity Requirement
- Load forecasting and
- An assessment of plant capacity performance.

The procedures to be followed are fully documented and, if followed, should result in compliance with the Market Rules.

5.2.1 Reserve capacity cycle

The current Reserve Capacity Cycle will not be completed until the end of 2007. However, all steps to date have been completed and posted on the IMO website.

The IMO have advised via their website that a Reserve Capacity Auction is not required for the period 1 October 2009 and 1 October 2010.

5.2.2 Reserve capacity assessments

The results from the reserve capacity tests for the two periods

- 21 September 2006 to 31 March 2007 and
- 1 April 2007 to 30 June 2007

have been published on the IMO web site.

However, we note that whereas reserve capacity testing is to be done with all fuel types the first set of testing was not done on liquid fuel. This was as a result of a decision made by the IMO that, having missed the appropriate window in time to carry out liquid fuel tests without imposing excessive costs on the participants, the IMO would forego such testing at that time. The subsequent testing has been on all fuel types.

PA considers this non-compliance not to be material.

5.2.3 Individual reserve capacity requirements

The monthly 5.2.3 Individual reserve capacity requirement ratios are published on the IMO web site.

However, we note that the publication of the May 2007 IRCR was published one day late due to Wednesday 25 April being ANZAC Day. This non-compliance is considered not to be material.

5.2.4 Load forecasting

The load forecasting for the reserve capacity function is carried out by an external consultant; currently the National Institute of Economic and Industry Research (NIEIR). However, the IMO is responsible for:

- The preparation of data for the consultant and
- The receipt and further use of the results.

Although the procedures to be followed are fully documented and, if followed, will ensure compliance with the Market Rules, we noted one area in which the procedures could be made more robust. Microsoft Excel spreadsheets are used extensively in the preparation of the data and in subsequent processing. This is largely due to the generation data being on an “as generated” basis and not on an “as sent out” basis, which is what is required for load forecasting. That is, the historical data used for load forecasting includes the local load at the generating station which must be subtracted to determine the actual generation supplied to the SWIS.

Several of the steps to be taken in manipulating the data involve copying data from one place to another. These could be automated using a macro with a resulting increase in security to ensure that inadvertent errors in copying and pasting do not occur.

5.3 OPINION

As far as we have been able to determine, with the exceptions noted above in relation to capacity testing on liquid fuels, the IMO has complied with its obligations under Chapter 4 of the Market Rules.

6. MARKET RULE CHAPTER 5 – NETWORK CONTROL SERVICE PROCUREMENT

6.1 DOCUMENTATION

Market Rule Chapter 5 sets out the Network Control Service Procurement Rules which are the responsibility of the IMO in its System Capacity role.

The relevant Market Procedure is

- Market Procedure for Network Control Services

and there are no relevant IMO Internal procedures.

6.2 COMPLIANCE WITH CHAPTER 5

As at 21 September 2007, the IMO has not used the provisions of Chapter 5 of the Market Rules. However, the procedures to be followed are fully documented and, if followed, should result in compliance with the Market Rules.

6.3 OPINION

We are able only to advise that should the IMO utilise the provisions of Chapter 5 of the Market Rules, the procedures set out in the Market Procedure for Network Control Services are expected to ensure that the IMO will do so in a manner that complies with Chapter 5 of the Market Rules.

7. MARKET RULE CHAPTER 6 – ENERGY MARKET

7.1 DOCUMENTATION

Market Rule Chapter 6 sets out the Energy Market Rules, which are the responsibility of the IMO in its Market Operations role. There are no relevant Market Procedures and the relevant IMO Internal Procedures are:

- Internal Procedure: Daily Operations Procedure Manual
- Internal Procedure: Monthly Operational Procedure Manual
- Internal Procedure: Operational Contingency Procedure Manual
- Operations Contingency Procedures.

7.2 COMPLIANCE WITH CHAPTER 6

The IMO functions in the energy market fall into those that are daily functions and those that are monthly functions.

7.2.1 Daily functions

The daily functions associated with the energy market are fully documented in the Internal Procedure: Daily Operations Procedure Manual and consist of:

- Clearing the STEM and publishing the STEM results and then
- Preparing and publishing the resource plan and balancing data and the dispatch merit orders.

These functions are automated so that the only reason for non-compliance is that required input data, such as the load forecast, outage and ancillary services requirements from System Management are not received in time thus prospectively delaying the clearing of the STEM. Missing participant offers will not delay the STEM as in the absence of daily offers the STEM will revert to standing offers. Should data from System Management not be received or be incorrect the limit calculations can still be run and advised to market participants.

7.2.2 Monthly functions

As with the daily functions, the monthly functions associated with the energy market are fully documented in the Internal Procedure: Monthly Operations Procedure Manual and consist of:

- Updating the Alternative Maximum STEM Price
- Determining the Individual Reserve Capacity Requirements
- Conducting the Reserve Capacity Allocation and
- Calculating the monthly Reserve Capacity Cost.

These functions are managed manually and if conducted according to the Monthly Operations Procedure Manual will comply with the requirements of the Market Rules.

Noted non-compliances have been a failure to open or close the Reserve Allocation Window at the required time. This non-compliance is considered to be non-material because the window was opened and participants advised.

7.3 OPINION

As far as we have been able to determine, with the above exceptions, the IMO has complied with its obligations under Chapter 7 of the Market Rules.

8. MARKET RULE CHAPTER 7 – DISPATCH

8.1 DOCUMENTATION

Market Rule Chapter 7 sets out the Dispatch Rules which are the responsibility of System Management and the IMO in its Market Operations role. There are no relevant IMO Market Procedures and the relevant IMO Internal Procedures are

- Internal Procedure Daily Operations Procedure Manual.

8.2 COMPLIANCE WITH CHAPTER 7

The obligations of the IMO with respect to Dispatch under the Market Rules fall in to three parts:

- To receive load forecasts and outage data from System Management (Sections 7.2 and 7.3)
- To provide Resource Plans and Dispatch Merit Orders and Fuel Declarations, data to System Management (Sections 7.4 and 7.5) and
- To publish reports (Sections 7.12).

The first two of these are integral to the operation of both the market and the power system and any non-compliance becomes immediately obvious. Such non-compliance has not been found.

8.3 OPINION

As far as we have been able to determine, the IMO has complied with its obligations under Chapter 7 of the Market Rules.

9. MARKET RULE CHAPTER 8 – WHOLESALE MARKET METERING

9.1 DOCUMENTATION

Market Rule Chapter 8 sets out the Wholesale Market Metering Rules which are the responsibility of the IMO in its Market Operations role. The relevant Market Procedures are

- Market Procedure for Meter Data Submissions

and the relevant IMO Internal Procedure is:

- Internal Procedure: Metering Procedure Manual

9.2 COMPLIANCE WITH CHAPTER 8

The obligations of the IMO with respect to meter data under the market rules fall in to three parts:

- To operate a meter data registry (Section 8.3)
- To receive meter data (Section 8.3) and
- To specify meter data formats (Section 8.3).

The obligations of the IMO under Chapter 8 are met through the publication of the Market Procedure for Meter Data Submissions

However, the implicit obligations on the IMO in operating a “fit for purpose” meter data reception and management function are covered by the Internal Procedure: Metering Procedure Manual

As with many of the IMO Internal Procedures, the Metering Procedure Manual is a “how to do it” manual, which sets out in detail the steps to be taken in processing the metering files. Should these steps not be taken correctly, the process will not complete properly. Hence there is little scope for non-compliance with the market rules. Further, data errors are not the responsibility of the IMO but of the Meter Data Agents.

The daily data reception function is largely automated with only monitoring of the process required.

Monthly tasks are of the nature of “house-keeping” and “sanity check” data validation as are required to ensure that the IMO continues to act in accordance with its function as opposed to complying with specific obligations.

No evidence was found of problems having occurred in the meter data handling, although there have been errors in the meter data itself – these being the responsibility of the Meter Data Agent.

9.3 OPINION

As far as we have been able to determine, the IMO has complied with its obligations under Chapter 8 of the Market Rules.

10. MARKET RULE CHAPTER 9 – SETTLEMENT

10.1 DOCUMENTATION

Market Rule Chapter 9 sets out the Settlement Rules which are the responsibility of the IMO in its Market Operations role. The relevant Market Procedures are:

- Market Procedure for Capacity Credit Allocation
- Market Procedure for Settlement
- Settlement Cycle Timelines.

and the relevant IMO Internal Procedures are:

- Internal Procedure: Settlement Procedure Manual
- Internal Procedure: Operational Finance Procedure Manual
- Settlement Transaction Timelines and Austraclear Processes.

10.2 COMPLIANCE WITH CHAPTER 9

The procedures to be followed are fully documented and, if followed, should result in compliance with the Market Rules.

The settlements software has been separately tested to ensure that its calculations comply with the requirements of the Market Rules. Therefore, this section of the market audit focuses on the processes followed by the IMO.

Settlements are divided into STEM settlement and Non-STEM settlement activities.

STEM settlements are largely automated with operator checking at each step. Due to the automation and step checking, it is difficult, if not impossible, for the outcomes not to comply with the market rules.

The most common form of errors in the Non-STEM settlement are reported to be due to the quality of data that is supplied by the Metering Data Agent or System Management which is sourced from the SCADA system.

These Non-STEM settlement steps have been checked and have been found to be in compliance with the Market Rules.

Non-STEM settlement requires a script to be prepared, by the settlement operator, from a master script. The operator includes and deletes specific steps as required given the advised relevant matters. The prepared script is approved by the Manager of Operations before it is run. As with the STEM settlement runs, the Non-Stem settlement run is largely automated, with the operator checking that each step has run correctly before triggering the next step.

Due to the time taken to conduct a full Non-STEM settlement run, there have been occasions earlier in the life of the market in which there was later publication of the settlement invoices. This has been resolved.

The third component in the Settlements Process is the logging and processing of “disagreements”. Note that although called “disagreements”, the register consists of all matters requiring consideration in the Non-STEM settlement, such as plant outages, etc.

These are submitted to the IMO by a variety of mechanisms: fax, phone call, letter or email. These are cleared by the duty operator and the settlement operator is made aware of them so that they can be acknowledged within one day. The management of the “disagreements” is a manual process and, as such, can be prone to error. This is countered by the IMO having the same operator take the settlement process through all applicable months of the settlement process. Hence, the IMO relies on the institutional memory of the settlement operator of those matters that are required to be accounted for in the settlement scripts.

Equally, the process relies on participants who have raised (correctly) a “disagreement” recognising that they have not received an acknowledgement for the IMO to be aware that they have “lost” a “disagreement”.

In this respect, we understand that the IMO has not yet “lost” a “disagreement”.

We have noted an occasion on which a settlement report was not created and was subsequently created and published a day late and an occasion on which non-STEM settlement invoices were created a day late. Neither of these non-compliances is considered to be material.

10.3 OPINION

As far as we have been able to determine, with the above exceptions, the IMO has complied with its obligations under Chapter 9 of the Market Rules.

11. MARKET RULE CHAPTER 10 – MARKET INFORMATION

11.1 DOCUMENTATION

Market Rule Chapter 10 sets out the Market Information Rules which are the responsibility of the IMO in its Market Administration role. The relevant Market Procedures are:

- Market procedure for Information Confidentiality Procedure
- Web Site Change Procedure

and the relevant IMO Internal Procedures are:

- Internal Procedure: Handling of Confidential Information
- Internal Procedure: Publish to Web.

11.2 COMPLIANCE WITH CHAPTER 10

We have reviewed both the Market and Internal Procedures relating to Market information and consider that, provided due care is taken, these set out adequate procedures to protect the integrity of and access to market information.

These procedures are supported by two documents, published on the IMO web site

- An overview of the confidentiality statuses of document available at http://www.imowa.com.au/10_5_1_a_ii_market_documents_and_confidentiality_status.htm
- The list of publications produced and their confidentiality status at http://www.imowa.com.au/Attachments/confidentiality_status_publication_070124.pdf

We also note that these procedures will not, of themselves, prevent human error as in the inadvertent publication of a System Management Outage Report instead of the System Management Report. This was found to be due to the incorrect report being sent by System Management and not then checked by the IMO before publishing it on the IMO website.

Our checking has shown that all reports required to be published under Market Rule 10.5.1 or under other Market Rules have been published with the exception of :

- The requirement under 10.5.1(j)iii to publish Load Summary reports which have since been published except for October and June, these are outstanding due to a technical difficulty
- The requirement under 10.5.1(v) to publish Accounting Information which was finally published in mid-September
- And the requirement under 10.5.1(y) to publish real-time data as soon as practicable following the completion of a Trading Interval but a number of dates less than 48 intervals have been published.

In our checking publications, which are required to be made, we noted other apparent delays in publication of reports which were found to be broken due to broken web links,

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which are now corrected. However, these reports had been published and could be accessed using other links.

11.3 OPINION

As far as we have been able to determine, with the above exceptions, the IMO has complied with its obligations under Chapter 10 of the Market Rules.

APPENDIX A: MAPPING OF IMO MARKET RULE OBLIGATIONS TO IMO MARKET PROCEDURES AND INTERNAL PROCEDURES

A.1 CHAPTER 1

Clause	Obligation	Procedure
1.6 – Notices		
1..61	The IMO must develop a Market Procedure which sets out the method by which notices and communications required under, contemplated by or relating to, these Market Rules are to be given to or by the IMO.	Market Procedure for Notices and Communications

A.2 CHAPTER 2

Clause	Obligation	Procedure
2.3 - The Market Advisory Committee		
2.3.2	IMO must develop and publish a constitution for the MAC	Constitution of the Market Advisory Committee at http://www.imowa.com.au/%5CAttachments/Constitution%20of%20the%20Market%20Advisory%20Committee%20December%202006.pdf
2.3.4	IMO must invite public submissions when developing/amending the constitution of the MAC	
2.3.8	IMO may appoint and remove members of MAC	
2.3.9	IMO must review composition of MAC	MR2.3 - Annual Review of MAC Composition, section 2.4
2.3.10	When doing 2.3.8, IMO must consult and take nominations from	MR2.3 - Annual Review of MAC Composition, section 3.1.2

Clause	Obligation	Procedure
	relevant industry groups and choose from nominees where practicable	
2.3.11	IMO may remove member of MAC under certain conditions	MR2.3 - Annual Review of MAC Composition, section 2.3
2.3.14	IMO must provide a secretariat for the MAC	
2.3.16	IMO must provide members of the MAC with information	
2.4 - Market Documents		
2.4.1	General responsibility for MR falls on IMO	
2.4.2	IMO must not make Amending Rules (AR) that are inconsistent with Wholesale Market Objectives	
2.4.3	IMO must take into account certain matters when deciding whether to make AR	
2.4.4	IMO must maintain a Rules Change Proposal form on the Market Web Site	http://www.imowa.com.au/Attachments/Rule%20Change%20Proposal%20Form_hdr.doc
2.5 - Rule Change Proposals		
2.5.3	IMO must develop a Rules Change Proposal	
2.5.4	IMO must develop a Rules Change Proposal	
2.5.5	IMO may seek clarification from person submitting Rules Change Proposal	MR2.5-2.7 - Rule Change Procedure, section 4.3
2.5.6	IMO must notify submitter of rule change proposal as to whether proposal will be progressed.	MR2.5-2.7 - Rule Change Procedure, section 4.4
2.5.7	IMO must publish notice of rule change proposal	MR2.5-2.7 - Rule Change Procedure, section 4.5

Clause	Obligation	Procedure
2.5.8	IMO must notify Minister of a Protected Provision rule change	MR2.5-2.7 - Rule Change Procedure, section 4.5.2 step 2
2.5.9	IMO may categorise Rule Change Proposal as Fast Track	MR2.5-2.7 - Rule Change Procedure, section 4.4
2.5.11	IMO must reclassify a Fast Track Rule Change Proposal if it extends the timetable by more than 15 BD.	MR2.5-2.7 - Rule Change Procedure, section 6.4
2.5.12	IMO must publish a notice of extension and update any information already published in accordance with clause 2.5.7(f)	MR2.5-2.7 - Rule Change Procedure, section 5.5
2.5.13	A notice of extension must include various things	MR2.5-2.7 - Rule Change Procedure, section 5.5
2.6 - Fast Track Rule Change Process		
2.6.1	IMO notifies those it intends to consult with in regard to a fast track rule change	MR2.5-2.7 - Rule Change Procedure, section 4.5
2.6.3.	IMO completes consultation on a fast track rule change proposal	MR2.5-2.7 - Rule Change Procedure, section 6.3
2.6.4	IMO must prepare and publish a final rule change report on a fast track rule change.	MR2.5-2.7 - Rule Change Procedure, section 6.5
2.6.4(f)	Draft Report must contain IMO's decision to accept (in proposed or modified form) or reject the Rule Change Proposal.	MR2.5-2.7 - Rule Change Procedure, section 6.5
2.7 - Standard Rule Change Process		
2.7.2	IMO must release all information provided during the submission process	MR2.5-2.7 - Rule Change Procedure, section 5.6.2 step 11
2.7.3	IMO may hold public forums	MR2.5-2.7 - Rule Change Procedure, section 5.3
2.7.4	IMO must notify MAC of a rule change proposal (standard process)	MR2.5-2.7 - Rule Change Procedure, section 5.2
2.7.5	IMO must convene MAC (standard process)	MR2.5-2.7 - Rule Change Procedure, section 5.2 (however criteria are not specified)

Clause	Obligation	Procedure
2.7.6	IMO must publish draft rule change report and deadline of at least further 20 BD for further submissions (standard process)	MR2.5-2.7 - Rule Change Procedure, section 5.6
2.7.7	The draft Rule Change Report must contain various things	MR2.5-2.7 - Rule Change Procedure, section 5.6
2.7.8	IMO must publish final rule change report (standard process) including decision whether Rule Change Proposal will proceed	MR2.5-2.7 - Rule Change Procedure, section 5.8
2.8 - Review of IMO Rule Amendment Decisions, Ministerial Approval and coming into force of Rule Amendments		
2.8.3	IMO must submit rule change proposal and Final Report to Minister if Protected Provisions affected.	MR2.5-2.7 - Rule Change Procedure, section 5.8.3
2.8.7	IMO must publish notice of any extension made by the Minister under 2.8.6	MR2.5-2.7 - Rule Change Procedure, section 5.9
2.8.9	IMO must publish rejection of a rule change by Minister	MR2.5-2.7 - Rule Change Procedure, section 5.9
2.8.10.a	IMO must publish Amending Rules revised by the Minister	
2.8.10.b	IMO must provide revised final rule change report to Minister	
2.8.12	IMO must publish notice of when amending rules commence	MR2.5-2.7 - Rule Change Procedure, section 5.8/6.5
2.9 - Market Procedures		
2.9.1	IMO must manage the development of Market Procedures	
2.9.4	IMO must maintain a Procedure Change Submission Form on the Web Site	http://www.imowa.com.au/Attachments/Procedure%20Change%20Proposal-IMO_hdr.doc
2.9.5	IMO must develop an Administration Procedure	http://www.imowa.com.au/Attachments/IMOProcedures/Procedure%20Administration%20Procedure.pdf
2.9.6	IMO must comply with applicable Market Procedures	

Clause	Obligation	Procedure
2.10 - Procedure Change Process		
2.10.1	IMO may initiate Procedure Change Process by developing a Procedure Change Proposal	
2.10.3	IMO responsible for making amendments to Procedures that are required by amendments to Market Rules	MR2.10 - Market Procedure Change, section 2
2.10.4	IMO must publish SM procedure change proposal	MR2.10 - Market Procedure Change, section 3.1
2.10.5	IMO must publish its own Procedure Change Proposals	MR2.10 - Market Procedure Change, section 2.3
2.10.6	A Procedure Change Proposal must include various things	MR2.10 - Market Procedure Change, section 2.2
2.10.7	IMO must publish due date for submissions on a procedure change proposal	MR2.10 - Market Procedure Change, section 2.3
2.10.8	IMO must notify MAC if required to convene	MR2.10 - Market Procedure Change, section 2.4
2.10.9	IMO must convene MAC	MR2.10 - Market Procedure Change, section 2.4
2.10.10 to 2.10.12	IMO must prepares and publish, or just publish, procedure change report.	MR2.10 - Market Procedure Change, section 2.7
2.10.13	Procedure Change Report must contain the matters specified in the rule.	MR2.10 - Market Procedure Change, section 2.7
2.10.14	IMO must decide whether to approve/reject SM procedure changes	MR2.10 - Market Procedure Change, section 3.3
2.10.15	IMO must notify SM and publish information about the SM procedure change upon approval plus date for it to take effect	MR2.10 - Market Procedure Change, section 3.3
2.10.16.a	IMO must notify SM of rejection and publish reasons.	MR2.10 - Market Procedure Change, section 3.3
2.11 - Coming into force of Procedure Amendments		

Clause	Obligation	Procedure
2.11.4	IMO may extend time and date when Market Procedure commences	MR2.10 - Market Procedure Change, section 2.8
2.13 - Market Rule Compliance Monitoring and Enforcement		
2.13.2	IMO must monitor other Rule Participant behaviour for compliance with Market Rules and Procedures.	Compliance Monitoring, Investigation & Enforcement, section 2.1
2.13.3	IMO must ensure that it has procedures and systems in place to allow it to monitor Rule Participants' behaviour for compliance with the Market Rules and Market Procedures in accordance with the Monitoring Protocol.	Compliance Monitoring, Investigation & Enforcement, section 2.1
2.13.10	IMO must record and investigate any alleged breach that it becomes aware of, and issue a warning if it believes a breach has taken place	Compliance Monitoring, Investigation & Enforcement, section 2.1 & 2.2
2.13.11	IMO may meet with Rule Participant to discuss alleged breach	Compliance Monitoring, Investigation & Enforcement, section 2.2
2.13.12	IMO may do various things as part of an investigation into alleged breach	Compliance Monitoring, Investigation & Enforcement, section 2.4.2
2.13.14	IMO may appoint a person to investigate alleged breach	Compliance Monitoring, Investigation & Enforcement, section 2.4.3
2.13.15	IMO must decide if a breach has occurred	Compliance Monitoring, Investigation & Enforcement, section 2.5
2.13.16	IMO may decide there has been a breach of the Market Rules and issue a penalty notice, or decide there's been no breach and notify the Market Participant.	Compliance Monitoring, Investigation & Enforcement, section 2.5 & 2.6
2.13.18	IMO may bring proceedings before the Energy Review Board	Compliance Monitoring, Investigation & Enforcement, section 2.9
2.13.20	IMO must cooperate with an investigation of its alleged breach	
2.13.24	IMO may direct Rule Participant to do/not do to give effect to any order of the Energy Review Board	

Clause	Obligation	Procedure
2.13.26	IMO must release a report of civil penalties and proceedings, findings and orders of the Energy Review Board	Compliance Monitoring, Investigation & Enforcement, section 1.5
2.13.27	IMO must have regard to Wholesale Market Objectives when considering circulating a report of civil penalties, etc	
2.13.28	IMO may release a report on matters where it made a decision under 2.13.16(a) or which have been referred to the ERB.	Compliance Monitoring, Investigation & Enforcement, section 1.5
2.13.31	IMO must provide reports to all Rule Participants and interested parties, unless inappropriate	
2.14 – Audit		
2.14.1	IMO must appoint Market Auditors.	res ipsa loquitur
2.14.2	IMO must ensure Auditor carries out annual audits of the matters required by the Market Rules	res ipsa loquitur
2.14.3	IMO must ensure Auditor carries out the audits appropriately	
2.14.4	IMO must either accept the Auditor's report or prepare one of its own.	
2.14.5	IMO must publish auditor's report and IMO's report	
2.14.6.a	IMO requires SM to demonstrate compliance	
2.14.6.b	IMO must annually audit the SM	
2.14.7	IMO must provide report to Minister on SM compliance	
2.15 - Monitoring and Reporting Protocols		
2.15.1	IMO must develop and implement a Monitoring Protocol	

Clause	Obligation	Procedure
2.15.3	Monitoring Protocol must specify various things	
2.15.8	IMO and ERA must agree a reporting protocol which must specify various things	
2.16 - Monitoring the effectiveness of the market		
2.16.1	IMO must compile and analyse data identified in the Market Surveillance Data Catalogue	MR2.16 - Market Surveillance Internal Procedure, section 5
2.16.2	IMO must develop a market surveillance catalogue	http://www.imowa.com.au/MarketSurveillanceDataCatalogue.htm
2.16.3	IMO must publish the market surveillance catalogue	http://www.imowa.com.au/MarketSurveillanceDataCatalogue.htm
2.16.4	IMO must carry out analysis to calculate relevant summary statistics	
2.16.5	IMO must provide data to ERA	
2.16.8	IMO must assist ERA to investigate behaviour related to market power.	
2.16.9 & 2.16.9A	IMO must assist ERA in monitoring activities	
2.16.9B.a	IMO requests explanation from participant for unreasonable costs	MR2.16 - Market Surveillance Internal Procedure, section 6.2
2.16.9B.b	IMO advise ERA of unreasonable STEM cost data	
2.16.9D	IMO publishes participant explanation	MR2.16 - Market Surveillance Internal Procedure, section 6.3
2.16.9H	IMO must refer a matter to the ERB for civil penalties	MR2.16 - Market Surveillance Internal Procedure, section 6.4
2.16.14	The IMO must use information provided by the ERA under clause 2.16.6(c) only for the purpose of carrying out its functions under clause 2.16	
2.18 – Disputes		

Clause	Obligation	Procedure
2.18.3	IMO as Dispute Participant may refer question of law to court	MR2.18 - Internal Procedure Dispute Resolution, section 1.1
2.18.4	IMO as Dispute Participant must not agree to resolution inconsistent with Market Rules	MR2.18 - Internal Procedure Dispute Resolution, section 1.1
2.19 - First Stage Dispute Resolution		
2.19.1	IMO as Rule Participant may issue dispute notice to another Rule Participant	
2.19.2	IMO as Rule Participant may name in Notice of Dispute any Rule Participant that may be affected	
2.19.3	Notice of Dispute must contain various things	
2.19.4	IMO as Rule Participant receiving Notice of Dispute must supply confirmation of receipt	MR2.18 - Internal Procedure Dispute Resolution, section 1.3 step 4
2.19.5	IMO may join a Rule Participant to a dispute	MR2.18 - Internal Procedure Dispute Resolution, section 1.3 step 6
2.19.6	IMO as Dispute Participant must make reasonable endeavours to meet and resolve in good faith	MR2.18 - Internal Procedure Dispute Resolution, section 1.3 step 7
2.20 - Second Stage Dispute Resolution		
2.20.1	IMO as Dispute Participant must give consideration to resolving Dispute through mediation/ADR/etc	MR2.18 - Internal Procedure Dispute Resolution, section 1.3.2
2.20.2	IMO as Dispute Participant may commence court proceedings	MR2.18 - Internal Procedure Dispute Resolution, section 1.3.2
2.21 - Market Consultation		
2.21.1	IMO must consult on such matters as are specified in the Market Rules	
2.21.2	IMO must consult in good faith	

Clause	Obligation	Procedure
2.22 - Determination of the IMO's budget		
2.22.3.a	IMO must submit proposal for allowable revenue over review period to ERA	MR2.22 - determination of IMO budget, section 1.3
2.22.5	IMO must submit budget proposal for coming year to Minister	MR2.22 - determination of IMO budget, section 1.3
2.22.8	IMO applies to ERA to reassess allowable revenue where budget required exceeds 15% of allowable revenue	MR2.22 - determination of IMO budget, section 1.3
2.22.11	IMO must publish budget approved by Minister	MR2.22 - determination of IMO budget, section 1.3
2.22.13	IMO may declare a project to be a Declared Market Project under certain conditions	MR2.22 - determination of IMO budget, section 1.3
2.22.14	IMO must obtain approval from the ERA for an increase in Allowable Revenue	MR2.22 - determination of IMO budget, section 1.3
2.23 - Determination of System Management's budget		
2.23.9	IMO must review SM budget proposal and report to the Minister	
2.23.11	IMO must publish budget provided by SM	
2.24- Determination of Market Fees		
2.24.2	IMO must determine and publish fees to apply from 1 July	
2.24.3	IMO must publish an estimate of its total revenue by source	
2.25 - Payment of Market Participant Fees		
2.25.1	IMO must charge Fees under Market Rule 9.1.3	
2.25.3	IMO must pay SM and ERA following receipt of payment	

Clause	Obligation	Procedure
2.27 - Determination of Loss Factors		
2.27.3	IMO publishes loss factors	MR2.27 - Determining Loss Factors Procedure, step 1
2.27.3A	Publication of time for loss factors to apply (including changes under 2.27.4.e)	MR2.27 - Determining Loss Factors Procedure, step 4
2.27.3B	IMO must allow sufficient time for Market Participants to identify and update Standing Data	MR2.27 - Determining Loss Factors Procedure, section 1.3
2.27.4(b).i	IMO must announce plan to audit loss factor calculation	MR2.27 - Determining Loss Factors Procedure, section 1.4
2.27.4(b).ii	IMO must audit loss factor calculation	MR2.27 - Determining Loss Factors Procedure, section 1.4
2.27.5	IMO must continue to use equivalent Loss Factor from the previous year until the Network Operator has provided the IMO with the new Loss Factor	MR2.27 - Determining Loss Factors Procedure, step 12
2.27.6	IMO must document standards to be used in determining Loss Factors	
2.28 - Rule Participants		
2.28.13	IMO must determine the class of person not covered by previous sub-sections	
2.28.16	IMO may determine that a person is exempted from the requirement to register, and apply conditions.	Rule Participant Exemption to Register, section 2
2.28.16A(b)	IMO must register Intermediary as Rule Participant	Rule Participant Exemption to Register, section 2.1.2
2.29 - Facility Registration Classes		
2.29.9	IMO may determine that a person is exempted from the requirement to register a facility and apply conditions.	

Clause	Obligation	Procedure
2.29.10	The IMO must exempt a person from the requirement to register a generating system	
2.30 - Facility Aggregation		
2.30.4	IMO must consult with SM when assessing an application for Facility aggregation.	http://www.imowa.com.au/Attachments/IMOProcedures/Facility%20Registration%20Procedure.pdf , section 1.7 step 20
2.30.5	IMO may only allow aggregation if no adverse effect on SM's ability to manage the Power System	http://www.imowa.com.au/Attachments/IMOProcedures/Facility%20Registration%20Procedure.pdf , section 1.7 step 22
2.30.8	IMO must inform relevant Rule Participant of date when aggregated facilities will be considered to be disaggregated.	http://www.imowa.com.au/Attachments/IMOProcedures/Facility%20Registration%20Procedure.pdf , section 1.7 step 25
2.30.10(b)	IMO may require Rule Participant to provide Standing Data when aggregated facility is disaggregated	http://www.imowa.com.au/Attachments/IMOProcedures/Facility%20Registration%20Procedure.pdf , section 1.7 step 26
2.30.11	IMO must document the facility aggregation and disaggregation process	http://www.imowa.com.au/Attachments/IMOProcedures/Facility%20Registration%20Procedure.pdf , section 1.7 Facility Aggregation heading
2.30A - Exemption from Funding Spinning Reserve		
2.30A.2	IMO must exempt Intermittent Generator meeting certain ramping conditions from funding Spinning Reserve costs	http://www.imowa.com.au/Attachments/IMOProcedures/Facility%20Registration%20Procedure.pdf , section 1.6 step 27
2.30A.3	IMO must consult with System Management when assessing exemption	List of events.xls, Exemption from Funding Spinning Reserve Cost
2.30A.5	IMO must inform Market Participant and include facility in Appendix 2	
2.30A.6	IMO must document the Spinning Reserve costs exemption process in the Registration Procedure.	http://www.imowa.com.au/Attachments/IMOProcedures/Facility%20Registration%20Procedure.pdf , section 1.6 step 27

Clause	Obligation	Procedure
2.30B - Intermittent Load		
2.30B.3	IMO must require that applicant to register Intermittent Load provide specified information	http://www.imowa.com.au/Attachments/IMOProcedures/Facility%20Registration%20Procedure.pdf , talks of general stuff to do with intermittent loads
2.30B.4	IMO must use the information provided by Market Customer under clause 2.30B.3	
2.30B.6	IMO must accept an application for Load to be Intermittent Load if conditions are met	
2.30B.7	IMO may cease to treat a Load as an Intermittent Load and require it to modify its Standing Data	
2.30B.8	IMO must consult with SM in determining whether Load is Intermittent Load.	
2.30C - Rule Commencement and Registration Data		
2.30C.1	IMO must not require registration prior to commencement of relevant Market Rules	
2.30C.3	IMO must notify Rule Participants of changes to Standing Data	
2.31 - Registration Process		
2.31.1	IMO must maintain Registration Forms on the Market Web Site	
2.31.3	IMO must acknowledge receipt of participant or facility registration application.	In the various Registration Procedure documents
2.31.5	IMO must consult SM and may consult Network Operators	various facility documents, eg Facility Registration, section 2.3.2
2.31.6	IMO must notify the schedule of acceptance process for facility	

Clause	Obligation	Procedure
	registration	
2.31.7	IMO may determine that a test required under Market Rules is not necessary	
2.31.10	IMO must accept or reject application	
2.31.11	IMO must include certain information in the notice to the applicant	General Registration Event, section 2.2.2
2.31.12	IMO must give reasons for rejection	General Registration Event, section 2.3.4
2.31.13	IMO may reject an application only if specified conditions are met	
2.31.21	IMO must maintain a register of Rule Participants and Registered Facilities	
2.31.22	IMO must only indicate that it can facilitate participation in a Rule Participant class or Facility Class if System Management actually can	
2.31.23	IMO must document the registration, de-registration and transfer process in the Registration Procedure	
2.32 - Rule Participant Suspension and Deregistration		
2.32.1	IMO must issue a suspension notice to a participant	MR2.37-2.43 - Prudential Procedure, section 4.3.1
2.32.2	IMO must copy suspension notice to all rule participants	MR2.37-2.43 - Prudential Procedure, section 4.3.2 step 1
2.32.3	IMO may specify directions the Rule Participant must comply with to give effect to the Suspension Notice	
2.32.4	IMO may reject Submission and/or withhold payments due to a defaulting Rule Participant	MR2.37-2.43 - Prudential Procedure, section 4.3.2 step 2
2.32.5	IMO must withdraw a suspension notice	MR2.37-2.43 - Prudential Procedure, section 4.3.4 step 1

Clause	Obligation	Procedure
2.32.6	IMO may apply to ERB to deregister a suspended Rule Participant	MR2.37-2.43 - Prudential Procedure, section 4.3.3 step 1
2.32.7	IMO must de-register a rule participant	MR2.37-2.43 - Prudential Procedure, section 4.3.3 step 2
2.32.9	IMO may require NO to disconnect suspended/deregistered facilities	MR2.37-2.43 - Prudential Procedure, section 4.3.2 step 3
2.32.9	IMO must request NO reconnected previously suspended Facilities	
2.33 - The Registration Forms		
2.33.1	Rule Participant registration form (2.31.1(a)) must require an applicant to provide certain information	http://www.imowa.com.au/Attachments/MarketForms/Application%20to%20Register%20for%20WEMS%20access%20form_rev6.doc
2.33.2	Rule Participant de-registration form (2.31.1(b)) must require an applicant to provide certain information	http://www.imowa.com.au/Attachments/MarketForms/Application%20to%20De-Register%20as%20a%20Participant%20v1.doc
2.33.3	Facility registration form (2.31.1(c)) must require an applicant to provide certain information	http://www.imowa.com.au/Attachments/Prudential/Application_to_Register_a_Facility_Name_20070605.pdf
2.33.4	Facility de-registration form (2.31.1(d)) must require an applicant to provide certain information	http://www.imowa.com.au/Attachments/MarketForms/Application%20to%20De-Register%20a%20Facility%20v1.doc
2.33.5	Facility transfer form (2.31.1(e)) must require an applicant to provide certain information	http://www.imowa.com.au/Attachments/MarketForms/Application%20to%20Transfer%20a%20Facility%20v1.doc
2.34 - Standing Data		
2.34.1	IMO must maintain a record of Standing Data and provide it to SM.	
2.34.5	IMO must confirm receipt of request for standing data change	
2.34.6	IMO may request further information from a Rule Participant regarding a change in Standing Data	
2.34.7	IMO may reject a change	

Clause	Obligation	Procedure
2.34.8	IMO must notify participant of acceptance/rejection of standing data change	
2.34.9	IMO must give reasons for rejection	
2.34.11	IMO may require a Rule Participant to provide updated Standing Data	
2.34.12	IMO must consult with SM before requesting updated Standing Data	
2.34.13(b)	IMO may temporarily substitute data until Rule Participant updates Standing Data	
2.34.14	IMO must commence using revised Standing Data	
2.36 - Market Systems Requirements		
2.36.1	IMO must keep a record of version of software	
2.36.5	IMO must document data and It interface requirements in the relevant procedure, and comply with that procedure.	
2.36.6	IMO may require Market Participants to submit information using software systems tot the IMO specifies, and may reject information that is submitted by any other method.	
2.37 - Credit Limit		
2.37.1	IMO must determine a credit limit for each Market Participant.	MR2.37-2.43 - Prudential Procedure, section 2.2.1
2.37.2	IMO may revise credit limits	MR2.37-2.43 - Prudential Procedure, section 3.2
2.37.3	IMO must review Market Participant credit limits	MR2.37-2.43 - Prudential Procedure, section 3.2
2.37.4	IMO must take into account specified matters when determining a credit limit	MR2.37-2.43 - Prudential Procedure, section 3.2

Clause	Obligation	Procedure
2.37.6	IMO must determine Credit Limit for each NO that funds a Network Control Service Contract	
2.37.7	IMO must review Network Operator credit limits	
2.37.8	IMO must notify MP and NO of credit limit (including details)	
2.37.9	IMO must develop guidelines in the Prudential Procedure for determining expected value of transaction.	http://www.imowa.com.au/Attachments/IMOProcedures/Prudential%20Requirements%20Procedure.pdf , section 5
2.38 - Credit Support		
2.38.5	IMO must pay accumulated interest each month at the daily Bank Bill rate.	
2.41 - Trading Margin		
2.41.3	IMO may reject Submission if it could result in the Trading Margin of the Market Participant being exceeded	
2.41.4	IMO may notify Market Participant at any time of the level of their Trading Margin	
2.42 - Margin Call		
2.42.1	IMO may issue a Market Call Notice to a Market Participant	MR2.37-2.43 - Prudential Procedure, section 3.1.1 step 5
2.42.5	IMO may cancel a Margin Call Notice at any time	
2.42.7	IMO must review and increase credit limit	MR2.37-2.43 - Prudential Procedure, section 3.1.2 step 9
2.43 - Prudential Market Procedure		
2.43.1	IMO must develop a Prudential Procedure	
2.44 - Minister's Emergency Powers		

Clause	Obligation	Procedure
2.44.1	IMO must comply with Minister's request to suspend the Market	
2.44.2	IMO must lift suspension	
2.44.3	IMO must notify Market Participants of any suspension or lifting of suspension	
2.44.4	IMO may give direction to Market Participants during a suspension	

A.3 CHAPTER 3

Clause	Obligation	Trigger	Procedure
3.8 - Investigating Incidents in the SWIS			
3.8.2	IMO must coordinate investigation of incidents on the SWIS (where IMO considers investigation warranted)	SM notifies IMO of incident (clause 3.8.1)	MR3.8 - Investigation of Incidents II.0, section 2.1.1
3.8.3	IMO must publish report on an investigation	Completion of investigation described in clause 3.8.2	MR3.8 - Investigation of Incidents II.0, section 2.1.3 step 6
3.8.4 to 3.8.6	IMO must initiate rule/procedure changes or requires SM to do same (if required)	Completion of investigation described in clause 3.8.2	MR3.8 - Investigation of Incidents II.0, section 2.1.3 step 8
3.11 - Determining and Procuring Ancillary Service Requirements			
3.11.6	IMO must audit Ancillary Service Requirements	Submission of revision by SM (under this clause 3.11.6)	MR3.11 - Ancillary Services Requirements Procedure, section 1.2
3.11.12	IMO must audit Ancillary Services plan	Submission by SM (clause 3.11.11)	MR3.11 - Ancillary Services Requirements Procedure, section 1.4

Clause	Obligation	Trigger	Procedure
3.11.13	IMO must publish approved report	Completion of audit (clause 3.11.12)	MR3.11 - Ancillary Services Requirements Procedure, section 1.4 step 13
3.15 - Review of Ancillary Service Requirements Process and Standards			
3.15.1	IMO, assisted by SM, must review basis for setting ancillary service requirements (includes public consultation)	As required	
3.15.2	IMO must publish report on review	IMO completes review of basis for setting ancillary service requirements (clause 3.15.1)	
3.15.3	If report recommends a rule change, IMO must make a Rule Change Proposal		
3.16 - Medium Term PASA			
3.16.9	IMO must publish MT PASA report provided by SM	SM provides IMO report (this clause, 3.16.9)	http://www.imowa.com.au/10_5_1_n_mt_pasa.htm
3.17 - Short Term PASA			
3.17.2	IMO must publish ST PASA report	SM provides IMO report (Rule 317.1)	http://www.imowa.com.au/10_5_1_o_st_pasa.htm
3.18 - Outage Scheduling			
3.18.2.e	IMO must publish list of equipment on outage list provided by SM	SM provides IMO report (this clause 3.18.2.e)	http://www.imowa.com.au/%5CAttachments%5CSMReports%5COutagePlanningList.pdf
3.18.3.b	IMO must consult with SM, MP or NO on inclusion of facility on list	Participant request reassessment (Rule 3.18.3.a)	
3.18.3©	IMO may give a direction to SM that a		

Clause	Obligation	Trigger	Procedure
	Facility should not remain on the list		
3.18.15.e	IMO must consult with SM, MP or NO on outage and reaches a conclusion	Participant applies for re-assessment (Rule 3.18.5.b)	
3.18.15(f)	IMO may give direction to SM that the Outage Plan should be scheduled in SM's outage schedule		
3.18.18	IMO, assisted by SM, must review basis for outage planning		
3.18.19	IMO must publish report on review	Completion of review (clause 3.18.18)	
3.18.20	IMO must initiates rule/procedure changes (if required)	Completion of review (clause 3.18.18)	
3.19 - Outage Approval			
3.19.12.e	IMO must determine amount of outage compensation and/or informs participant for reasons for its determination	Participant applies for outage compensation (Rule 3.19.12.a)	MR3.20 - Outage Compensation Procedure, section 4.1
3.19.12(f)(ii)(1)	IMO must endeavour to not recover more than \$50,000 in any Trading Month		0 MR3.20 - Outage Compensation Procedure, section 4.2
3.22 - Settlement Data			
3.22.1	IMO must provide information to settlement		

A.4 CHAPTER 4

Clause	Obligation	Procedure
4.1 - Reserve capacity cycle		
4.1.4	IMO must advertise an EoI for Reserve Capacity	SC 02 - Calling for EOIs for New Capacity - Master, section 1.1
4.1.5	IMO must allow time for EoI responses	SC 03 - Processing of EOIs for New Capacity - Master, section 1.2.2 step 5
4.1.6	IMO publishes EOI response summary	SC 03 - Processing of EOIs for New Capacity - Master, section 1.2.4
4.1.7	IMO must accept applications for certification of Reserve Capacity	
4.1.8	IMO publishes statement of opportunities report	SC 04 - Statement of Opportunities Report - Master
4.1.9	IMO release reserve capacity info pack to EOI respondents	SC 05 - Reserve Capacity Information Pack - Master, section 1.2.3
4.1.10	IMO publishes reserve capacity info pack	SC 05 - Reserve Capacity Information Pack - Master, section 1.2.3
4.1.11	IMO ceases to accept applications for certification of Reserve Capacity	SC 06 - Certification of Facilities - Master, section 1.1
4.1.12	IMO notifies RC certification applicants of certified capacity	SC 06 - Certification of Facilities - Master, section 1.1
4.1.15	IMO notifies MP of approved bilateral trades	
4.1.16	IMO announces if RC auction needed	
4.1.17	IMO must accept submissions of Reserve Capacity Offers	
4.1.18.a	IMO runs the RC auction	

Clause	Obligation	Procedure
4.1.18.b	IMO publishes RC auction results	
4.1.19	IMO commence review of Max Reserve Capacity Price	
4.1.21	IMO notifies participant that RC security deposits not required	
4.1.24	IMO publishes IRCR	
4.1.27	IMO notifies MP that RC security deposit no longer required once operational	
4.1.28	IMO updates and publishes IRCR values monthly	
4.1.29	Dates applicable to prices	
4.1.32	IMO must publish any extended date and time made under clause 4.1.	
4.2 - Expression of interest process		
4.2.2	IMO must prepare a Request for EoI	SC 02 - Calling for EOIs for New Capacity - Master
4.2.3	REoI is to be made available on website or by application	
4.2.4, 4.2.5	IMO must advertise the REoI, and may continue to publish it	SC 02 - Calling for EOIs for New Capacity - Master, section 1.2.3
4.2.7	IMO must publish the following information	SC 03 - Processing of EOIs for New Capacity - Master, section 1.2.3
4.3 - Information to be included in Request for Expression of Interest		
4.3.1	Various pieces of information are to be included	SC 02 - Calling for EOIs for New Capacity - Master, section 1.2.2 step 3
4.5 - Long Term PASA		

Clause	Obligation	Procedure
4.5.1	To be performed annually	
4.5.2(a)-(e)	Must take into account the factors	
4.5.2A	IMO must determine an estimate of Reserve Capacity to cover Intermittent Loads	
4.5.3	IMO requests LT PASA information from participants	
4.5.5	May request from non-participants	
4.5.6	IMO must review information provided and may seek clarification	
4.5.7	IMO must treat all information provided as confidential	
4.5.8	IMO may generate its own data where data provided is inadequate	
4.5.9	Planning criteria	
4.5.10	IMPO must use the assembled information to assess whether capacity can meet planning criteria, and forecast the Reserve Capacity Target.	
4.5.11	IMO must publish Statement of Opportunities Report for a Reserve Capacity Cycle	
4.5.12	Data to be contained in the availability curve	
4.5.13	Data to be contained in the SOO	
4.5.14	IMO must document its procedure for conducting reviews and must comply with that procedure	
4.5.15	IMO must review Planning Criterion and its peak load forecast method	

Clause	Obligation	Procedure
4.5.16	IMO must invite submissions	
4.5.17	IMO must make a draft review report available for comment	
4.5.18	IMO must publish a final report	
4.5.19	IMO must initiate rule/procedure changes (if required)	
4.5.20	IMO must make sure that any 3rd party is familiar with its methodology and approve any variation in the process to be used with that 3rd party	
4.7 - Reserve capacity information pack		
4.7.1	IMO must release Reserve Capacity information Pack to those who provided EoI	SC 05 - Reserve Capacity Information Pack - Master, section 1.2.3
4.7.2	IMO must publish Reserve Capacity Information Pack on the Market Web Site	SC 05 - Reserve Capacity Information Pack - Master, section 1.2.3
4.7.3	Information to be in the Info pack	SC 05 - Reserve Capacity Information Pack - Master, section 1.2.2
4.9 - Process for applying for certification		
4.9.4	IMO must specify the form of applications for certification of Reserve Capacity (implied).	http://www.imowa.com.au/Attachments/Approved%20Procedure%20for%20Certification%20of%20Reserve%20Capacity.pdf
4.9.5 (c)	IMO must confirm Reserve Capacity information that was previously conditionally assigned	http://www.imowa.com.au/Attachments/Approved%20Procedure%20for%20Certification%20of%20Reserve%20Capacity.pdf , section 1.8 step 13
4.9.5(d)	IMO must process re-lodged application without regard for the Conditional Certified Reserve Capacity	http://www.imowa.com.au/Attachments/Approved%20Procedure%20for%20Certification%20of%20Reserve%20Capacity.pdf , section 1.8 step 13

Clause	Obligation	Procedure
4.9.6	IMO must notify an application of receipt of RC certification request	http://www.imowa.com.au/Attachments/Approved%20Procedure%20for%20Certification%20of%20Reserve%20Capacity.pdf , section 1.5 step 8
4.9.8.a	IMO notifies applicant for current position	SC 06 - Certification of Facilities - Master, "Sending written notification of CRC" NOTE incorrectly states that no date is specified for this
4.9.8.b	IMO notifies applicant for conditional certification of result	http://www.imowa.com.au/Attachments/Approved%20Procedure%20for%20Certification%20of%20Reserve%20Capacity.pdf
4.9.9	IMO must advise applicant of RC information	SC 06 - Certification of Facilities - Master, "Sending written notification of CRC"
4.9.10	IMO must document the procedure that Market Participants must follow in applying, and that it will follow in assessing applications.	http://www.imowa.com.au/Attachments/Approved%20Procedure%20for%20Certification%20of%20Reserve%20Capacity.pdf
4.11 - Setting certified reserve capacity		
4.11.1	IMO must apply specified principles in assigning Certified Capacity Reserve	http://www.imowa.com.au/Attachments/Approved%20Procedure%20for%20Certification%20of%20Reserve%20Capacity.pdf , various sections
4.11.2	IMO must decide whether to accept nomination of alternative RC method	http://www.imowa.com.au/Attachments/Approved%20Procedure%20for%20Certification%20of%20Reserve%20Capacity.pdf , section 1.9
4.11.3A	How the IMO must determine the Relevant Level	http://www.imowa.com.au/Attachments/Approved%20Procedure%20for%20Certification%20of%20Reserve%20Capacity.pdf , section 1.9
4.11.4	IMO must indicate applicable Availability Class	http://www.imowa.com.au/Attachments/Approved%20Procedure%20for%20Certification%20of%20Reserve%20Capacity.pdf , section 1.10, 1.13

Clause	Obligation	Procedure
4.11.5	IMO may seek information from NOs to confirm accuracy of data but must only disclose the name of the Facility.	http://www.imowa.com.au/Attachments/Approved%20Procedure%20for%20Certification%20of%20Reserve%20Capacity.pdf , section 1.8
4.11.6	IMO must accredit and manage at least 2 experts to prepare reports on estimated RC of Intermittent Generators.	http://www.imowa.com.au/Attachments/Approved%20Procedure%20for%20Certification%20of%20Reserve%20Capacity.pdf , section 1.5 step 8
4.11.9	IMO must review information provided by Western Power under clause 4.11.8	
4.12 - Setting reserve capacity obligations		
4.12.3	IMO must use information to set Reserve Capacity Obligation Quantity for each Facility for each Trading Period.	http://www.imowa.com.au/Attachments/Approved%20Procedure%20for%20Certification%20of%20Reserve%20Capacity.pdf , various sections
4.12.4	IMO must use specified principles to establish Reserve Capacity Obligation Quantity	http://www.imowa.com.au/Attachments/Approved%20Procedure%20for%20Certification%20of%20Reserve%20Capacity.pdf , various sections
4.13 - Reserve capacity security		
4.13.6	IMO must pay interest	
4.13.8	IMO must develop a Market Procedure dealing with Reserve Capacity and must comply with it.	
4.13.9.a	IMO must cancel the certified reserve capacity for bilateral trade facility	
4.13.9.b	IMO must cancel the certified reserve capacity for auction facility	
4.13.10.a	IMO notifies participant that security no longer required (clause 4.1.21) and returns security deposit	

Clause	Obligation	Procedure
4.13.10.b	IMO returns RC security deposit for a facility that has achieved 100% of its obligation	
4.13.10.c	IMO returns RC security deposit for a facility that only achieved 90% of its obligations	
4.13.11	When IMO ceases security deposit it must allocate revenue between various costs in settlement	
4.14 - Participant auction and bilateral declaration		
4.14.5	IMO calculates EGC peak summer load - which must be traded bilaterally	
4.14.6	IMO must reject one Facility if more than one proposed for the same site	
4.14.7.a	IMO must validate bilateral trade submissions and endeavour to resolve matter with participant	
4.14.7.b	IMO must inform participant if bilateral trade submission ok	
4.14.7.c	If IMO cannot make sense of bilateral trade declaration submission, move to a default	
4.14.8	Obligations to terminate	
4.14.9	IMO must notify each Market Participant of the quantity of Certified Reserve Capacity that it can trade bilaterally.	
4.15 - Confirmation or cancellation of RC auctions		
4.15.1	IMO must publish notice cancelling Reserve Capacity Auction, and other Reserve Capacity information	

Clause	Obligation	Procedure
4.15.2	IMO must publish notice of Reserve Capacity auction	
4.16 - Maximum reserve capacity price		
4.16.1	IMO must publish Maximum Reserve Capacity Price	
4.16.3	IMO must annually review the value of the Maximum Reserve Capacity Price.	SC 01 - Determination of Maximum Reserve Capacity Price, section 1.2.2 step 1
4.16.4	IMO must assess the appropriateness of values specified in the rule	SC 01 - Determination of Maximum Reserve Capacity Price, section 1.2.2 step 2
4.16.5	IMO must propose a revised value for the Maximum Reserve Capacity Price.	SC 01 - Determination of Maximum Reserve Capacity Price, section 1.2.2 step 3
4.16.6	IMO must widely publicise and make available draft report on maximum reserve capacity price (and request submissions)	SC 01 - Determination of Maximum Reserve Capacity Price, section 1.2.3
4.16.7	IMO develops final RC price and submits it, report and submission to ERA	SC 01 - Determination of Maximum Reserve Capacity Price, section 1.2.3 step 1
4.16.8.b	IMO "makes" the new max RC price by publishing notice of it on web site	
4.17 - RCA submission process		
4.17.1	IMO must prescribe a Reserve Capacity Auction form and post it on the Web Site	
4.17.3	IMO must confirm receipt of Reserve Capacity Offer (and indicate acceptance/rejection)	
4.17.4	IMO may reject a RC offer	
4.17.5	IMO to arrange resubmission of offer	

Clause	Obligation	Procedure
4.17.8	IMO may not accept a RC Offer submitted out of time	
4.17.9	IMO must document RC Auction process in the RC Procedure, and must comply with it.	
4.19 – RCA Clearing		
4.19.3	IMO must not accept RC offers from 2 or more Facilities that cannot be simultaneously scheduled, and instead must apply methodology from Appendix 3.	
4.19.5	IMO must publish RC Price and scheduled quantity	
4.20 - Capacity Credits		
4.20.2	IMO must confirm receipt of Capacity Credit submissions (and indicate acceptance/rejection)	Capacity Credit Allocation Procedure (market), section 1.7.3
4.20.3	IMO may only reject a notice that is inconsistent with the Market Rules	Capacity Credit Allocation Procedure (market), section 1.7.2
4.20.4	IMO must give reasons for rejecting a notice.	Capacity Credit Allocation Procedure (market), section 1.7.2
4.21 - Short term price arrangements		
4.21.1	IMO grants ST SPAs	
4.22 - Long term price arrangements		
4.22.3	IMO adjusts LT SPA values for inflation	
4.23A - Capacity credits and facility registration		
4.23A.1	Steps the IMO must convert stuff associated with WP generation plant	

Clause	Obligation	Procedure
4.23A.2	Steps the IMO must take in performing allocations under 4.23A.1	
4.23A.3	IMO re-allocation of capacity credits	
4.24 - Supplementary reserve capacity		
4.24.1	IMO activates supplementary capacity process	SC 16 - Supplementary Reserve Capacity, section 1.1
4.24.2.a	IMO tenders for supplementary capacity	SC 16 - Supplementary Reserve Capacity, section 1.2.2.1
4.24.2.b	IMO negotiates for supplementary capacity or tender	SC 16 - Supplementary Reserve Capacity, section 1.2.2.2
4.24.5	IMO cannot call a tender more than 6 months before event	SC 16 - Supplementary Reserve Capacity, section 1.2.4.2
4.24.6	IMO must advertise tender	SC 16 - Supplementary Reserve Capacity, section 1.2.4.6
4.24.7	IMO must prescribe a tender form	SC 16 - Supplementary Reserve Capacity, section 1.2.4.3
4.24.8	How the IMO must determine the result of a call for tenders	SC 16 - Supplementary Reserve Capacity, section 1.2.5
4.24.9	IMO not under an obligation to accept any tender	SC 16 - Supplementary Reserve Capacity, section 1.2.5.7
4.24.10	IMO must supply specified information to suppliers with whom it negotiates direct	SC 16 - Supplementary Reserve Capacity, section 1.2.6.2
4.24.11	IMO must endeavour to minimise the cost of eligible services	SC 16 - Supplementary Reserve Capacity, section 1.2.5.8
4.24.12	IMO must maintain standard form Supplementary Capacity Contract	SC 16 - Supplementary Reserve Capacity, section 1.2.7.1
4.24.15	IMO must recover full costs of Supplementary Capacity Contracts	SC 16 - Supplementary Reserve Capacity, section 1.2.9.2
4.24.16	IMO provides Supplementary Capacity Contract data to SM	SC 16 - Supplementary Reserve Capacity, section 1.2.8.1
4.24.17	IMO must not provide certain information to SM for any eligible service.	SC 16 - Supplementary Reserve Capacity, section 1.2.8.2

Clause	Obligation	Procedure
4.24.18	IMO must documents its procedures and follow them.	SC 16 - Supplementary Reserve Capacity.doc
4.25 - Reserve capacity testing		
4.25.1	IMO observes or tests facility complying with its RC obligations	http://www.imowa.com.au/Attachments/IMOProcedures/Reserve%20Capacity%20Testing%20Procedure.pdf , section 1.7.1
4.25.2.b	IMO requires SM to perform a test	http://www.imowa.com.au/Attachments/IMOProcedures/Reserve%20Capacity%20Testing%20Procedure.pdf , section 1.7.6
4.25.3	IMO must not subject a Facility to a test for RC	http://www.imowa.com.au/Attachments/IMOProcedures/Reserve%20Capacity%20Testing%20Procedure.pdf , section 1.7.8
4.25.4	IMO requires retest after a test failed	http://www.imowa.com.au/Attachments/IMOProcedures/Reserve%20Capacity%20Testing%20Procedure.pdf , section 1.9.9
4.25.5 to 4.25.7	IMO requires third test to be performed	http://www.imowa.com.au/Attachments/IMOProcedures/Reserve%20Capacity%20Testing%20Procedure.pdf , section 1.9.13
4.25.11	IMO publishes report on testing and test delays	http://www.imowa.com.au/Attachments/IMOProcedures/Reserve%20Capacity%20Testing%20Procedure.pdf , section 1.11.1
4.25.13	IMO must monitor on-site fuel storage	
4.25.14	IMO must document the procedure for RC tests and must follow that procedure	Reserve Capacity Testing Procedure
4.26 - Financial implications of failure to supply RC		
4.26.2	IMO must determine capacity shortfall in RC relative to RC Obligation Quantities	
4.26.2B	IMO must set the factor in RCOQ(p,d,t)	
4.26.3	IMO must determine Capacity Cost Refund	

Clause	Obligation	Procedure
4.26.4	IMO must apply any revenue to Market Customers	
4.26.5	IMO must record temperature data	
4.27 - Reserve Capacity performance monitoring		
4.27.1	IMO daily monitoring of RC performance	SC 11 - Performance Monitoring - Master, section 1.1
4.27.2	IMO must make monthly assessment of RC market performance	SC 11 - Performance Monitoring - Master, section 1.2.1
4.27.3	IMO must require poor performers to file reports	SC 11 - Performance Monitoring - Master, section 1.2.2 step 3
4.27.6	IMO must consult SM on the implications of the report	http://www.imowa.com.au/Attachments/IMOProcedures/Reserve%20Capacity%20Performance%20Monitoring%20Procedure.pdf , section 1.6.9
4.27.7	IMO updates data in submitted report	http://www.imowa.com.au/Attachments/IMOProcedures/Reserve%20Capacity%20Performance%20Monitoring%20Procedure.pdf , section 1.6.10
4.27.9	IMO notifies market of very bad performance and triggers tighter requirements on poor performers	http://www.imowa.com.au/Attachments/IMOProcedures/Reserve%20Capacity%20Performance%20Monitoring%20Procedure.pdf
4.27.12	IMO must document its procedure for performing RC monitoring and must follow that procedure	Reserve Capacity Performance Monitoring Procedure
4.28 - Funding RC		
4.28.1 to 4.28.5	IMO determines targeted and shared reserve capacity costs	
4.28.6	IMO must publish date and time for which RC requirements cover	
4.28.7	IMO must publish initial RC requirements for each market customer	
4.28.7A	IMO must set the Intermittent Load RC Requirement to apply for the first Trading Month of the Capacity Year for each Intermittent Load	

Clause	Obligation	Procedure
	for which a Market Customer provided information	
4.28.8B	IMO must accept a nomination for capacity	
4.28.9	IMO must only accept the load measured by an interval meter in the list provided under clause 4.28.8(a)	
4.28.10	IMO must only take into account a MW reduction that results from Demand Side Management measures specified in clause 4.28.8(b) if the measures would have lowered peak consumption	
4.28.11	The IMO must determine and publish an updated Individual Reserve Capacity Requirement for each Market Customer by the date and time specified in clause 4.1.28(b) where this Individual reserve Capacity Requirement:	
4.28.11A	IMO may apply different values so long as it preserves the ratio of peak demand associated with RC Requirement to RC Requirement.	
4.28.12	IMO may apply different values of RCR and peak load	
4.28.13	IMO must publish document the process	
4.28A - Intermittent load refunds		
4.28A.1, 4.28A.2	IMO must calculate Intermittent Load refund. IMO must record temperature data.	
4.28A.3	IMO must document its procedures in the Reserve Capacity Procedure and follow that procedure.	
4.28B - Small generators		
4.28B.4, 2.28B.6	IMO processes application for capacity credits for small generator	
4.28B.8	IMO must publish document the process	Treatment of Small Generators Procedure

Clause	Obligation	Procedure
4.29 - Settlement		
4.29.3	IMO prepares monthly RC settlement data	
4.29.4	IMO must adjust quantities specified in clause 4.29.3(d)	

A.5 CHAPTER 5 NETWORK CONTROL SERVICES PROCUREMENT

Clause	Obligation	Procedure
5.1 - Obligations and definitions		
5.1.3	IMO must not enter into Network Control Service Contract except following tender process or with approval of Minister (for Market Commencement).	
5.1.4	IMO must seek to carry out expression of interest and other processes in a way that minimises its costs	
5.2 - Procurement requirements		
5.2.2	IMO may extend the contracted period	
5.2.3	IMO calls for Expressions of Interest for Network Control Service	Network Control Service Procedure (market), section 1.2
5.2.6	IMO notifies NO and respondents of outcome of EOI	
5.2.7	IMO publishes need for a tender	Network Control Service Procedure (market), section 1.2
5.3 - NCS certification		

Clause	Obligation	Procedure
5.3.6	IMO certifies Network Control Service or rejects	Network Control Service Procedure (market), section 2.2.13
5.3.9	IMO must publish document the process	Network Control Service Procedure (market)
5.4 - NCS tenders		
5.4.1	IMO publishes timeline for certification and tender process	Network Control Service Procedure (market), section 3.2.1
5.4.3	IMO issues invitation to tender	Network Control Service Procedure (market), section 3.2.3
5.4.8	IMO must seek to achieve lowest total cost of tenders	Network Control Service Procedure (market), section 3.2.7
5.4.9	IMO must accept tender in relation to entire quantity offered	Network Control Service Procedure (market), section 3.2.11
5.4.10	IMO informs NO and tenders of tender outcome	Network Control Service Procedure (market), section 3.2.5
5.4.11	IMO must execute network control service contract	Network Control Service Procedure (market), section 3.2.13
5.4.14	IMO must document procedure it followed in carrying out Network Control Service Procedure and follow that procedure	Network Control Service Procedure
5.5 - Contract conditions		
5.5.1	IMO develops a standard form Network Control Service contract	Network Control Service Procedure (market), section 4.1
5.5.2	IMO must consult with SM	0
5.5.4	IMO must consult with SM	Network Control Service Procedure (market), section 4.3
5.6 - NCS control compliance		
5.6.1	Testing processes etc to be defined in the contract	
5.6.2	IMO and SM must follow procedures in the contract	
5.6.3	Procedure to be followed after failure of a NCS	

Clause	Obligation	Procedure
5.7 - NCS dispatch		
5.7.1	IMO must provide SM with details of network control service contract	
5.8 - NCS contract payment		
5.8.2	IMO must pay Market Participant the monthly Network Control Service Contract payment as per Chapter 9.	
5.8.4	IMO bills NO for estimated cost of tender process	Network Control Service Procedure (market), section 5
5.8.5 to 5.8.7	IMO determines actual cost of tender and settles difference between this and estimate with NO	Network Control Service Procedure (market), section 5
5.9 - Settlement data		
5.9.1	IMO must provide information to settlement	

A.6 CHAPTER 6 THE ENERGY MARKET

Clause	Obligation	Procedure
6.2 - Bilateral Submission Timetable and Process		
6.2.2, 6.2.2A	Standing Bilateral Submission and revised Standing Bilateral Submission	Daily Operations Procedure Manual, section 1.3.3 step 1 & step 2
6.2.3, 6.2.4C, 6.2.8	IMO must communicate Bilateral Submission quantities and confirm cancellations	Daily Operations Procedure Manual, section 1.3.3 step 2 & step 3

Clause	Obligation	Procedure
6.2A - Standing Bilateral Submission Timetable and Process		
6.2A.2, 6.2.8	IMO must communicate acceptance of data, and confirm any cancellation	Daily Operations Procedure Manual, section 1.3.6 step 2
6.2A.5	IMO must communicate acceptance of data, and confirm any cancellation	
6.3A - Information to Support the Bilateral and STEM Submission Process		
6.3A.1.a	IMO must publish Load forecasts	Daily Operations Procedure Manual, section 1.3.2 step 2
6.3A.1.b	IMO must publish Information to support STEM	Daily Operations Procedure Manual, section 1.3.3 step 3
6.3A.2, 6.3A3	IMO must calculate, publish and update Participant and facility limits, capacity credits, energy to be called on, outages, etc	Daily Operations Procedure Manual, section 1.3.2 step 5
6.3A.4	IMO must update its calculations and release them	Daily Operations Procedure Manual, section 1.3.2 step 5
6.3B - STEM Submissions and Timetable Process		
6.3B.1A,	If IMO holds standing STEM submission it must make it the STEM submission.	Daily Operations Procedure Manual, section 1.3.4 step 1 NOTE: wrong rule number written in procedure
6.3B.1B	IMO must adjust standing STEM submission to make it valid.	Daily Operations Procedure Manual, section 1.3.2 step 4
6.3B.3	IMO must communicate with Market Participant when data received	Daily Operations Procedure Manual, section 1.3.4 step 2
6.3B.7B	IMO must confirm any cancellation and remove relevant data	Daily Operations Procedure Manual, section 1.3.4 step 2
6.3B.8	Where no stem submission accepted, IMO must record that none received	
6.3C - Standing STEM Submission Timetable Process		

Clause	Obligation	Procedure
6.3C.3	IMO must communicate to MP whether it accepts standing STEM submission data, and revise the data if accepted	Daily Operations Procedure Manual, section 1.3.4 step 2
6.3C.6C	IMO must confirm cancellation and remove relevant data	Daily Operations Procedure Manual, section 1.3.4 step 2
6.4 - The STEM Auction Timetable and Process		
6.4.1	IMO must run STEM auction and determine results	Daily Operations Procedure Manual, section 1.3.4 step 4
6.4.2	IMO informs SM of net contract positions	Daily Operations Procedure Manual, section 1.3.4 step 5
6.4.3	IMO sends STEM results to market participants	Daily Operations Procedure Manual, section 1.3.4 step 5
6.4.5	IMO must follow up if participant does not acknowledge receipt of STEM results	
6.5 - Resource Plan Submission Timetable and Process		
6.5.2	IMO must communicate whether it accepts data and if it does, revise the Resource Plan Submission	Daily Operations Procedure Manual, section 1.3.5 step 2
6.5.3	IMO receive by email or fax	Daily Operations Procedure Manual, section 1.3.5 step 2
6.5.4	IMO must prepare Default Resource Plan	Daily Operations Procedure Manual, section 1.3.5 step 1
6.5A - Balancing Data Submission Process and Timetable		
6.5A.1A	Where IMO holds standing Balancing Data that conforms, it must make it the Balancing Data Submission for the Trading Day	
6.5A2	IMO must communicate with Market Participant as to whether Submission accepted	
6.5C.2	IMO must communicate with Market Participant as to whether it accepts received data and must revise the Standing Resource Plan Submission	

Clause	Obligation	Procedure
6.5C.3	Applies only for that day	
6.5C.5	IMO must confirm any cancellation of Standing Resource Plan Submission and remove the relevant data	
6.6 - Format of STEM Submission and Standing STEM Submission Data		
6.6.10, 6.6.11	IMO must assess an application for a Scheduled Generator to be treated as dual-fuel capable and notify decision	
6.6.12	IMO must notify a Market Participant if it does not approve a dual-fuel application	
6.9 - The STEM Auction Process		
6.9.1	IMO must run STEM auction each Trading day	
6.9.3	IMO must determine STEM offers and bids	
6.9.4	IMO must not determine a STEM offers bids or price curves for a Market Participant that has not made a STEM submission	
6.9.5	IMO must determine aggregate STEM bid curve	
6.9.6	IMO must determine aggregate STEM offer curve	
6.9.7	IMO will determine STEM Clearing Price	
6.9.8	IMO will determine STEM Clearing Quantity	
6.9.9, 6.9.10	IMO must schedule all STEM bid price-quantity pairs.	
6.9.11, 6.9.12	IMO must schedule all STEM offer price-quantity pairs.	
6.10 - Suspension of the STEM		

Clause	Obligation	Procedure
6.10.1	IMO must suspend the STEM auction for a Trading Interval	Operational Contingency Procedure Manual, section 1.1
6.10.2	No one can buy or sell, no price set	Operational Contingency Procedure Manual, section 2.3
6.12 - The Dispatch Merit Order		
6.12.1	IMO produces dispatch merit orders	Daily Operations Procedure Manual, section 1.3.5 step 4
6.14 - Calculation of MCAP, UDAP and DDAP		
6.14.1	IMO must calculate and publish MCAP, UDAP and DDAP	Daily Operations Procedure Manual, section 1.3.7 step 3
6.14.2(a)	IMO must determine MCAP as the value for the equivalent Trading Interval	Daily Operations Procedure Manual, section 1.3.7 step 3
6.16 - Metering Schedule		
6.16.1	IMO must determine the meter schedule	
6.17 - Balancing Settlement Quantities		
6.17.1	IMO must determine Deviation Quantities and Dispatch Instruction Payment in accordance with clause 17	
6.18 - Commitment Compensation		
6.18.1	IMO will pay Commitment Compensation to a Market Participant	
6.19 - Market Advisories		
6.19.2, 6.19.3	IMO must issue a Market Advisory for future potential events that will or are likely to significantly impact on market operations	
6.19.4	Withdrawal of market advisory	
6.19.6	Market Advisory must contain certain things	

Clause	Obligation	Procedure
6.19.10	IMO must follow any documented Contingency Market Procedure	
6.20 - Energy Price Limits		
6.20.2	Maximum STEM Price updated annually	Monthly Operating Procedure Manual, section 1.2
6.20.3	Alternative Maximum STEM Price updated monthly	Monthly Operating Procedure Manual, section 1.2

A.7 CHAPTER 7 DISPATCH

Clause	Obligations	Procedure
7.2 Load Forecasts		
7.2.3C	IMO must arrange for SM to provide Load Forecast and Loss Factors information by extended deadline	Daily Operations Procedure Manual, section 1.3.2 step 1
7.2.3D	IMO must confirm receipt of submissions from SM (forecasts and ancillary service)	Daily Operations Procedure Manual, section 1.3.2 step 1
7.3 - Outages		
7.3.6	IMO must arrange for SM to provide information about outages by extended deadline	Daily Operations Procedure Manual, section 1.3.3 step 3
7.3.7	IMO must confirm receipt of submissions from SM (outage)	Daily Operations Procedure Manual, section 1.3.3 step 3
7.4 - Resource Plans		
7.4.1	IMO provides SM with resource plans	
7.4.3	If no confirmation from SM (resource plans), IMO contact SM and apply alternative communication method	

Clause	Obligations	Procedure
7.5 - Dispatch Merit Orders and Fuel Declarations		
7.5.1	IMO provides SM with dispatch merit orders	Daily Operations Procedure Manual, section 1.3.5 step 4 NOTE: manual refers to incorrect section in Rules
7.5.3	If no confirmation from SM (dispatch merit orders) IMO contact SM and apply alternative communication method	Daily Operations Procedure Manual, section 1.3.5 step 4 NOTE: manual refers to incorrect section in Rules
7.6 - The Dispatch Criteria		
7.6.10	IMO provides SM with details of Reserve Capacity Obligations	Daily Operations Procedure Manual, section 1.3.8 step 2 NOTE: this talks of 'pushing data to settlement', is this providing SM with the details?
7.6.11	IMO provides SM with details of Supplementary Capacity Contracts	Daily Operations Procedure Manual, section 1.3.8 step 2 NOTE: this talks of 'pushing data to settlement', is this providing SM with the details?
7.6A - Scheduling and Dispatch of the Electricity Generation Corporation		
7.6A.9	SM must get IMO approval of confidential procedures	
7.6A.10	Refusal criteria	
7.12 - Status Reports		
7.12.2	IMO publishes SM dispatch process report	
7.13 - Settlement and monitoring data		
7.13.1	No indication of action by the IMO if it does not receive S&M data	

A.8 CHAPTER 8 WHOLESALE MARKET METERING

Clause	Obligation	Procedure
8.3 - Meter Registry		
8.3.2	IMO notifies MDA that it requires confirmation of meter data in registration process	Nothing found although I would expect that this is covered in Participant de/registration manuals
8.3.4	IMO must notify MDA if it registers /deregisters a facility	Nothing found although I would expect that this is covered in Participant de/registration manuals
8.3.6	IMO must confirm receipt of MDA notification of changes	Not found in Metering Procedure Manual
8.3.7	IMO must make alternative arrangements for submission of information	Not found in Metering Procedure Manual
8.4 - Meter Data Submission		
8.4.4	IMO provides confirmation of receipt of metering data	Done automatically by IT system?
8.4.5	IMO must make alternative arrangements for submission of information	Not found in Metering Proc Manual
8.5 - Notices of Disagreement and Disputed Meter Data		
8.5.1	IMO must inform MDA of notices of disagreements related to meter data	Not found in Metering Procedure Manual
8.6 - Format of Meter Data Submissions		
8.6.2	IMO must document the format of meter data submissions in the Settlement Procedure	Not found in Metering Procedure Manual

A.9 CHAPTER 9 SETTLEMENT

Clause	Obligation	Procedure
9.1 - Settlement Conventions		
9.1.1	IMO may declare that part of a Trading Day is to be treated as if that part were a full Trading Day	
9.1.2d	IMO must include in Settlement Statements and Invoices the additional amounts contemplated by 9.1.2(c) (GST)	
9.1.4	IMO must perform all settlement calculations	
9.2 - Settlement procedure		
9.2.1	IMO must document the settlement procedure	
9.3 - Data Collection		
9.3.1	IMO must use certain information in performing settlement obligations	Settlement Procedure (market), section 1.7
9.3.3	IMO must determine Metered Schedule for each Facility and Non-Dispatchable Load for each Trading Interval.	Settlement Procedure (market), section 1.7
9.3.4A	IMO must determine a single Metered Schedule for a Trading Interval for Non-Dispatchable Loads without interval meters	Settlement Procedure (market), section 1.7
9.3.7	IMO must determine the Consumption Share (pm) for Market Participant	Settlement Procedure (market), section 1.7
9.4 - Capacity Credit Allocation Process		
9.4.2	IMO must prescribe a Capacity Credit Allocation Submission form and publish it on the Market Web Site	

Clause	Obligation	Procedure
9.4.5	IMO confirms receipt of a Capacity Credit Allocation from a capacity credit holder	
9.4.6	IMO must arrange for submitting Market Participant to provide valid Capacity Credit Allocation by mutually agreed means	
9.4.7	IMO confirms receipt of a Capacity Credit Allocation from a capacity credit holder	
9.4.8	IMO must accept a Capacity Credit Allocation Submission unless inconsistent with the requirements of clause 9.5	
9.4.9	IMO must identify each Market Participant that has had more Capacity Credits allocated to it than are required to cover its Individual Reserve Capacity Requirement.	
9.4.10	IMO request participants to modify Capacity Credit allocation	
9.4.12	IMO revokes Capacity Credit Allocation	
9.4.13	IMO must notify Market participants of capacity credits	
9.16 - Settlement Cycle Timelines		
9.16.1.a	IMO issues STEM settlement statements and invoices	Settlement Procedure (market), section 1.5
9.16.2.a	IMO must publish settlement cycle timeline	Settlement Procedure Manual, section 1.1.5
9.16.2.(b).i	Capacity Credit Allocation window opens	Settlement Procedure (market), section 1.5
9.16.2.(b) ii	Capacity Credit Allocation window closes	Settlement Procedure (market), section 1.5
9.16.2.(b)iii	Deadline for IMO to contact participants who need to modify allocations	Settlement Procedure (market), section 1.5
9.16.2.b.iv	Deadline for participants to make modifications	Settlement Procedure (market), section 1.5

Clause	Obligation	Procedure
9.16.2.b.v	Deadline for IMO to finalise reserve capacity allocations	Settlement Procedure (market), section 1.5
9.16.2.c	Non-STEM Settlement Statement Date	Settlement Procedure (market), section 1.5
9.16.2.d	Invoicing Date	Settlement Procedure (market), section 1.5
9.16.2.e	Non-STEM Settlement Date	Settlement Procedure (market), section 1.5
9.16.2.f	Non-STEM Settlement Disagreement Deadline	Settlement Procedure (market), section 1.5
9.16.3	IMO must undertake settlement adjustments	Settlement Procedure (market), section 1.5
9.16.4	IMO must publish settlement adjustment dates	Settlement Procedure Manual, section 1.1.5
9.16.4.a	Commencement date for settlement adjustment	Settlement Procedure (market), section 1.5
9.16.4.b	The date of release of adjusted STEM and non-STEM settlement statements	Settlement Procedure (market), section 1.5
9.16.4.c	The day that invoices reflecting adjusted statements released	Settlement Procedure (market), section 1.5
9.16.4.d	Adjusted settlement statement settlement day	Settlement Procedure (market), section 1.5
9.16.4.e	Deadline for notice of disagreements on adjusted settlement	Settlement Procedure (market), section 1.5
9.17 - STEM Settlement Statements		
9.19.1	IMO must recalculate amounts when undertaking an Adjustment Process	Settlement Procedure (market), section 1.5
9.19.2	IMO must record both values where data is modified and provide an explanation	
9.19.4	IMO may use current version of software to recalculate amounts as part of Adjustment Process	

Clause	Obligation	Procedure
9.20 - Notices of Disagreement		
9.20.2	IMO confirms receipt of notice of disagreement	Settlement Procedure Manual, section 6.3.1.3
9.20.3	IMO makes alternative arrangement for submission of Notice of Agreement	
9.20.5	IMO passes on notice of disagreement to other parties	
9.20.5.c	IMO requires MDA or SM to investigate accuracy of item in dispute	
9.20.6	IMO must determine a value for any input or review calculations for outputs of the settlement process	
9.20.7	IMO must respond to party that raised notice of disagreement	Settlement Procedure Manual, section 6.5.4.1
9.22 - Invoicing and Payment		
9.22.1.	Invoices must be issued to Rule Participants by the IMO in accordance with the timelines specified under clauses 9.16.1, 9.16.2, and 9.16.4.	Settlement Procedure Manual, section 4.5.1
9.22.3	IMO must maintain an account with an institution that meets the requirements of clause 2.38.6(a)	
9.22.4	IMO must nominate an ETF facility to be used for settlement	
9.22.8	IMO must pay participants	
9.22.9	IMO must establish a separate fund for Service Fee Settlement Amounts	
9.22.11	IMO may apply money from the separate fund to meet the costs incurred in carrying out its functions and obligations.	
9.23 - Default		

Clause	Obligation	Procedure
9.23.4	IMO issues cure notice	
9.23.5	IMO may extend deadline for remedying suspension event (major event)	
9.23.6	IMO may extend deadline for remedying suspension event (minor event)	
9.23.7	IMO may issue a suspension notice	
9.24 - Settlement in Default Situations		
9.24.1	IMO may draw down Credit Support	Operational Finance Procedure Manual, section 3.3.1
9.24.2.a	IMO may draw down Credit Support (where required to disgorge, repay an amount)	
9.24.2.b	Adjustment of Reconciliation Amount	
9.24.3	IMO must apply funds according to specified hierarchy of payment	Operational Finance Procedure Manual, section 3.3.1
9.24.4	IMO makes pro-rata payment of late payment (within 5 BDs)	
9.24.5	IMO must raise a default levy	
9.24.6	IMO notifies participants of their default levy	
9.24.8	IMO completes payment	
9.24.9	IMO reallocates Default Levies raised during the financial year.	
9.24.10	IMO recovers shortfall after raising a Default Levy.	

A.10 CHAPTER 10 INFORMATION POLICY

Clause	Obligation	Procedure
10.1 Record Retention		
10.1.1	IMO must develop and publish a list of all information that Market Participants must retain	
10.2 Information Confidentiality Status		
10.2.3	IMO must have regard to the principles stated in clause 10.2.3	
10.3.1	IMO must maintain a Web Site	MR10.5 - Publish to Web Procedure.doc
10.3.5	IMO must document protocols for SM and IMO to change the Web Site	MR10.5 - Publish to Web Procedure.doc
10.4.1	IMO must make information and documents available on application by any person who is a member of the correct confidentiality class.	
10.5.1	IMO must publish specified information as public information	
10.6.1	IMO must publish specified information as SWIS Restricted information	
10.7.1	IMO must publish specified information as Rule Participant Restricted information	
10.8.1	IMO must publish specified information as Rule Participant Dispatch Restricted information	
10.8.2	IMO must set the confidentiality status of all EGC information as Rule Participant Dispatch Restricted information	

