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## Wholesale Electricity Market – Submission to Procedure Change Proposal PC\_2012\_04 New IMS Interface Market Procedure

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### Submitted by

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<b>Date submitted:</b>	2 <sup>nd</sup> March 2012

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### Submission

Clause 2.10.7 of the Wholesale Electricity Market Amending Rules provides that any person may make a submission for a Procedure Change Proposal by filling in this Procedure Change Submission form.

Submissions for Procedure Changes that relate to the Power System Operation Procedures and IMO Market Procedures should be submitted to:

**Independent Market Operator**

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

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

System Management acknowledge the need for the IMO to prepare this Procedure Change Proposal to meet the new requirements of RC\_2011\_10. The procedure as supplied outlines a number of information flows between the organisations that currently exist as well as a number of proposed arrangements that are required by RC\_2011\_10.

The proposal was prepared before the Final Rule Change report was released. As such there are a number of inconsistencies between the proposal and the final rule change report. System Management would expect that the IMO would reflect changes from the final report in the New IMS Market Procedure. System Management will informally provide the areas where it believes the IMS Market Procedure is inconsistent with the final rule change report along with some other issues.

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

System Management has not undertaken an assessment of whether the Procedure Change Proposal is consistent with the Market Objectives.

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**3. Please indicate if the Procedure Change Proposal will have any implications for your organisation (for example changes to your IT or business systems) and any costs involved in implementing these changes.**

This market procedure will have significant impacts on System Management processes and IT systems. While a number of these have been anticipated by System Management as part of its new obligations under Rule Change RC\_2011\_10 there are a number of transfers that are not required by the market rules changes proposed under Rule Change RC\_2011\_10.

System Management have not made an assessment of those functions not covered by RC\_2011\_10. System Management propose to focus on new requirements of data provision first to allow the implementation of the new market arrangements in line with the 1<sup>st</sup> July 2012 timeframe.

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

There is some information that System Management and the IMO currently provide to each other in different formats than specified in the IMS procedure. System Management would anticipate these files being provided under the current arrangements until a full assessment can be carried out following the 1<sup>st</sup> July. System Management will continue to work with the IMO to provide a practical implementation schedule.

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