
Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2010_24 – Adjustment of Relevant Level (for intermittent generators)

Submitted by

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Submission

1. Please provide your views on the proposal, including any objections or suggested revisions.

Griffin generally agrees with the proposal. The current methodology of setting the relevant level for intermittent generators is compromised by not taking into account the instances where capacity is constrained that otherwise would have been available.

While the circumstances surrounding downward dispatch and consequential outage seem clear, there may be some conjecture over the circumstance where capacity is constrained due to a planned outage. The basis to the methodology set out in 4.11.3A is to determine the average capacity factor expected of the facility. This would normally include planned outages. However, the fact remains (and Griffin has direct experience of this), that if a planned outage is to occur during periods when demand unexpectedly approaches the available supply, then the intermittent generator may be requested to cancel the planned outage in order to make its capacity available to the market. While in most cases this will not occur, the ability for it to do so suggests the capacity available during planned outages should also be considered when setting the relevant level.

There will be an additional annual administrative burden in identifying intervals (of downward dispatch, planned or consequential outages), that should be included in the calculation of reserved capacity under 4.11.3A, as well as estimating the likely output if the plant were available. This burden, where practicable, should be placed on the Market Generator.

2. Please provide an assessment whether the change will better facilitate the achievement of the Market Objectives.

Market Objective (c) deals with non-discrimination against generation types. It is the case that intermittent generations use a different methodology to calculate reserve capacity than scheduled generators, so the difference between intermittent generators and scheduled generators (in this instance) is already accounted for in the rules. However it appears the intent of the methodology used to calculate reserve capacity for intermittent generators is not accurately reflected in the rules. In this regard, Griffin believes that objective (c) would be better met by this rule change proposal.

Griffin believes the proposed rule change is consistent with the remainder of the Market Objectives.

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

A small annual administrative burden may be incurred in analysing the previous years output against coincident downward dispatch instructions and consequential or planned outages. This cost is likely to be minimal.

4. Please indicate the time required for your organisation to implement the change, should it be accepted as proposed.

There should be no impact in this regard.
