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7<sup>th</sup> October 2009

Kate Hudson  
Electricity Commission  
Level 7 ASB Tower  
2 Hunter Street  
**Wellington**

Dear Kate

### **Submission on revised information system definition**

The System Operator has reviewed the definition of the revised Information System and the back up procedures. We have the following comments:

1. Section 1.3: Back up procedures

The rules require back up procedures to be 'specified' by the Market Administrator 'following consultation' with specific participants. Whilst the obligation varies throughout the rules in terms of whom to consult, the obligation to do so, and the requirement to specify the procedures remains constant.

Section 1.3 sets out the back up procedures specified by the Market Administrator. However, the Commission appears to have limited its specification of the information system back up procedures to the WITS. The information system, as defined by the Commission, is clearly broader than the WITS as is the Commission's obligation to specify the associated back up procedures.

Specifically, the table in paragraph 1.3 specifies 'the System Operator back up procedures' as those to use for rule 3.11, section III, part G and rule 3.35, section V, part G. Those back up procedures cannot possibly be specified. Apart from the fact they do not, as yet, exist; the Commission, as the Market Administrator, has not consulted with the System Operator, Clearing Manager, and Pricing Manager about such procedures as it is required to do under the rules.

The System Operator is of the view that the rules clearly require the Commission, as the Market Administrator, to act in a coordination role between the parties to arrive at a common back up procedure for exchanging the information required by the specific rules. To our knowledge, the Commission cannot, and has not delegated the authority to act on its behalf in this matter to the System Operator or any other participant. In the interim, until a back up

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procedure has been devised, consulted on, and specified, we suggest the back up procedures for rules 3.11 and 3.35 are left blank. In the meantime, the System Operator invites the Commission to work with it and the other relevant service providers to develop an appropriate procedure.

2. Section 3: Rule References

Ref. 7 refers to rule 3.10 of section III, which relates to information to be made available (under rule 3 of section III) by the System Operator to the Pricing and/or Clearing Manager. Ref. 8 then specifically refers to rule 3.8 which is a sub-set of the information sent under rule 3.10. This is somewhat confusing. In our view, it would be better to define the systems for rules 3.4, 3.8, and 3.9 of section III individually, as these are the relevant rules to which rule 3.10 applies. This has already been done for rule 3.8.

Please contact me if you would like to discuss any aspect of this submission further.

Yours sincerely



Fiona Abbott  
**System Operations Compliance Manager**