RC_2011_10: Competitive Balancing and Load Following Market

Submitted by

Name:	Graeme Alford
Phone:	9475 0144
Fax:	9475 0173
Email:	graeme.alford@landfillgas.com.au
Organisation:	Landfill Gas & Power Pty Ltd
Address:	PO Box 861 CLOVERDALE WA 6985
Date submitted:	7 February 2011

Submission

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

LGP supports the further proposed changes.

In particular we support the following principles:

Issue 1: Market Participants should be held accountable for their operational behaviour relative to their market submissions and Dispatch Instructions, and that non-compliance should be subject to the civil penalty provisions.

Issue 2: Compliance with Dispatch Instructions should be subject to the dispatch tolerance so as to facilitate compliance via "lumpy ramping" where necessary.

Issue 3: Balancing submissions should be treated as marketing representations with respect to price, quantity and Ramp Rate Limits, and should be subject to the appropriate consumer law provisions.

Issues 4 &5: We support the clarification and further development of the various settlement quantities.

Issue 6: A robust set of civil penalties and reviewable decisions should be implemented to ensure compliance with the new markets.