
Wholesale Electricity Market – Rule Change Proposal Submission Form

RC_2007_05 Reserve Capacity Refund Shortfall Formula

Submitted by

Name:	Graeme Alford
Phone:	9475 0144
Fax:	9475 0173
Email:	graeme@landfillgas.com.au
Organisation:	Landfill Gas & Power Pty Ltd
Address:	PO Box 861 CLOVERDALE WA 6985
Date submitted:	7 June 2007

Submission

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

We note that the proposed rule change is intended to correct an error that arose as a consequence of a prior rule change intended to ensure that the fulfilment of the Reserve Capacity obligation of a Market Generator which is also a Market Customer was properly determined. The original form of this change caused an unintended detrimental impact on Intermittent Generators that do not file valid STEM submissions via understating their capacity contributed and thereby miscalculating a refund to be due.

On this basis, we support this Rule Change.

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

We support the IMO's assessment of the change better facilitating the achievement of the Market Objectives and in particular emphasise that the importance of avoiding discrimination against technologies that make use of renewable resources and which reduce overall greenhouse gas emissions.

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

We understand this proposal will avoid the miscalculation of refund amounts being payable by our organisation, which is extremely important for us. There will be no organisational costs incurred by us as a consequence of adopting the change.

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

We understand the rule change to avoid discrimination against renewable generators and support its acceptance as proposed.
