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## Wholesale Electricity Market Rule Change Proposal Submission Form

<RC\_2007\_31> <High Risk and Emergency Operating States  
Definition>

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### Submitted by

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<b>Date submitted:</b>	1 February 2008

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### Submission

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

Clauses 3.4 and 3.5 of the Market Rules deal with high risk and emergency operating states, respectively.

System Management submits that it has received advice that these provisions are uncertain in their application, and seeks to remedy any potential uncertainty through an amendment to clarify the intended operation of the provisions.

Synergy views System Management's proposal as having some technical merit and does not foresee any material adverse impacts on Synergy's operations. As such, Synergy supports the proposal at this stage.

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

At this stage, Synergy accepts the System Management's view that the proposed rule change would support the Market Objective "to promote the economically efficient, safe and reliable production and supply of electricity and electricity related services in the South West interconnected system".

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**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.**

At this stage, Synergy identifies no significant cost increases in implementing this rule change proposal.

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

At this stage, Synergy believes that implementation of this rule change proposal would not take a protracted period of time to implement.

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