
Wholesale Electricity Market Rule Change Proposal Submission Form

<RC_2007_36> <Maximum Refund>

Submitted by

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Submission

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

The IMO proposes to amend the Market Rules to change the way Reserve Capacity Refunds are determined.

The IMO believes that the proposed change will remove the potential inequality in the treatment of Market Participants and will also remove an incentive to register several entities where each entity would individually hold a Facility.

Synergy views IMO'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.

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

At this stage, Synergy accepts the IMO's view that the proposed rule change would support 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.

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

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.
