Wholesale Electricity Market – Rule Change Proposal Submission Form

Rule Change Notice: RC_2008_07 Energy Price Limits Methodology

Submitted by

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Submission

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

LGP supports the recommendations of the Energy Price Limits Working Group to modify the procedure for setting the Energy Price Limits so as to exclude shutdown costs, include start up costs and use heat rates at minimum capacities.

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

LGP supports the Energy Price Limits Working Group's contention that the Rule Change would allow generators to fully recover their Short Run Marginal Costs in all circumstances.

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

LGP would incur no organisational costs 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

LGP would be able to implement this Rule Change immediately.

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