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## Wholesale Electricity Market Rule Change Proposal Submission Form

<RC\_2008\_10> < Capacity Credits and Facility Aggregation >

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### Submitted by

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<b>Date submitted:</b>	15 May 2008

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### Submission

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

The IMO proposes to amend the Market Rules to permit Market Participants, holding Capacity Credits, to aggregate some of their facilities and the Capacity Credits assigned to those facilities. To facilitate this, amendments to clauses 2.30.4 and 2.30.5; and insertion of new clauses 2.30.1A and 4.23A.4 of the Wholesale Electricity Market Rules is required.

The IMO has made a draft decision to amend clauses 2.30.4 and 2.30.5; and insert new clauses 2.30.1A and 4.23A.4 of the Wholesale Electricity Market Rules, as proposed by the IMO.

Synergy does not foresee any material adverse impacts of this rule on delivering against the Wholesale Market Objectives, nor specifically on Synergy's operations, and we therefore support the IMO's draft decision.

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

Synergy accepts the IMO's view that the proposed rule change supports the operation of the Market Objectives.

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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.**

Synergy does not identify any substantial cost implications in implementing this rule change.

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

Synergy does not anticipate that this rule change proposal will take a protracted period of time to implement.

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