Wholesale Electricity Market – Rule Change Proposal Submission Form

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Submitted by

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Submission

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

LGP supports the proposed Rule Change on the grounds that the commencement of capacity benefits and obligations should be simultaneous and that plant developers should be given reasonable flexibility in commencing meeting the obligations. The list of supporting evidence is well chosen and, as stated, more frequent reporting is unlikely to be significant for a well managed project.

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

LGP supports the IMO's contention that the Rule Change supports market objective (a) by improving reliability and security of supply in regard to new facilities that are entering the Wholesale Electricity Market by clarifying the processes of the Reserve Capacity Mechanism, and by allowing more appropriate and timely reporting of the progress of new Facilities.

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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