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## Wholesale Electricity Market – Rule Change Proposal Submission Form

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### RC\_2008\_20: Demand Side Management – Operational Issues

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#### Submitted by

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<b>Date submitted:</b>	27 October 2008

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#### Submission

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

###### COMMENTS ON THE DRAFT REPORT

LGP notes that this Rule Change is complex and is the outcome of a Working Group that was established prior to LGP's participation on the Market Advisory Committee.

As noted in our original submission, we support the general intent and the bulk of the content of the proposed Rule Change as a pragmatic improvement of the current system.

We retain our view that DSM is an environmentally essential feature of the market and its participation will be strengthened only by developing it as a standardised product that displaces generation. However, we support the IMO's endorsement of the majority view of the Working Group that proposed the changes, even though they are in many aspects contrary to our recommendations.