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## Wholesale Electricity Market Rule Change Proposal Submission Form

<RC\_2008\_23> < LNG to be Added to Liquid Fuel Definition >

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### Submitted by

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<b>Date submitted:</b>	25 July 2008

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### Submission

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

Synergy is generally sympathetic to the objectives of the proposal. However, Synergy cannot support this proposal unless the definition of Liquid Fuel under Chapter 11 of the WEM rules is revised to include, along with LNG, all other types of gas that have been stored and which are subsequently used to provide instantaneous power to the system.

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

The proposed rule change favours a particular type of technology, LNG. It therefore frustrates the Market Objective "to avoid discrimination in that market against particular energy options and technologies," per Rule 2.1.1(c).

A revision to the proposal so that it is extended to Stored Gas (defined to include all types of stored gas, including LNG, as suggested above) would remove the prejudice in favour of LNG.

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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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