
Wholesale Electricity Market Rule Change Proposal Submission Form

<RC_2008_24> < Commissioning Tests for Intermittent Generators >

Submitted by

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Submission

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

Intermittent Generators currently are not subject to a Reserve Capacity Obligation Quantity (RCOQ). Problematically, Intermittent Generators can commission plants without regard to RCOQ, which allows these generators to ignore Capacity Credit commitments. If an Intermittent Generator fails to provide the level of capacity associated with the Capacity Credits assigned by the IMO, unlike Scheduled Generators, no Capacity Cost Refund applies. The intent of this proposal is therefore to apply Capacity Cost Refund requirements to Intermittent Generators. Intermittent Generators not commissioned in accordance with their applications for Certified Reserve Capacity and with their assigned Capacity Credits, will be deemed by the IMO to owe Capacity Cost Refunds.

Synergy supports this rule change as providing consistent and equitable treatment for all providers of Capacity Credits.

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

Synergy supports the IMO's view that this proposal is consistent with Market Objective (a) by promoting the reliable production and supply of electricity and electricity related services in the South West Interconnected System. This will be achieved by improving the clarity in the process of Intermittent Facilities being granted Certified Reserve Capacity and subsequently receiving Capacity Credits, and providing incentives to Market

Participants developing Intermittent Facilities to develop projects in accordance with applications made to the IMO.

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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 identify any additional costs arising from the implementation of this rule change proposal.
