

27 October 2008

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By email: [marketadmin@imowa.com.au](mailto:marketadmin@imowa.com.au)

Dear Allan



**Alinta**

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## **WEM Rule Change Proposal RC 2008 29 – Change to curtailable load de-registration time frame**

Thank you for the opportunity to provide comments on Rule Change Proposal RC 2008 29 “Change to curtailable load de-registration time frame”. This letter sets out the view of Alinta Sales Pty Ltd (Alinta).

### ***The proposed change***

On the 11<sup>th</sup> of September 2008 the Independent Market Operator (IMO) submitted RC 2008 29. The IMO proposed to change the Market Rules in relation to the time frames required to de-register a Curtailable Load that is associated with a Demand Side Management (DSM) program.

The IMO proposed to decrease the time required to de-register a Curtailable Load associated with a DSM program from 6 months to 1 month. The IMO proposed that the change would increase the ability of participants to fulfil their obligations under DSM programs by more efficiently replacing loads in DSM programs when churn is occurring.

### ***Alinta's view***

Alinta agrees with the rule change proposal. In the event that a retailer with a DSM program loses a customer through churn which was also contributing towards a DSM requirement, the retailer should be allowed to substitute the lost customer with another customer as soon as possible.

Alinta welcomes the proposed reduction from 6 to 1 month for de-registering a Curtailable Load. Furthermore, Alinta questions whether there is any genuine need to impose any restriction on the timetable for de-registration of a Curtailable Load.

Alinta believes the change proposal would promote achievement of objectives (b)<sup>1</sup> of the Market Rules and not be an impediment to achieve any of the other Market Objectives.

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<sup>1</sup> The objectives of the Market Rules are contained in Market Rule 1.2.1 and are:

(a) “to promote the economically efficient, safe and reliable production and supply of electricity and electricity

## ***IT systems and cost implications***


Alinta has not identified any significant cost impact for its own IT systems.

## ***Time required for implementation***

Alinta does not require any specific lead time to allow implementation of the proposal.

Please call me on 08 9486 3313 to discuss any of the issues raised in this letter in more detail.

Yours sincerely



FOR

**Kristian Myhre**  
**Manager Market Analytics**  
**Alinta Sales Pty Ltd**

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related services in the South West Interconnected System”

(b) “to encourage competition among generators and retailers in the South West Interconnected System, including by facilitating efficient entry of new competitors”

(c) “to avoid discrimination in that market against particular energy options and technologies, including sustainable energy options and technologies such as those that make use of renewable resources or that reduce overall greenhouse gas emissions”

(d) “to minimise the long-term cost of electricity supplied to customers from the South West interconnected system”

(e) “to encourage the taking of measures to manage the amount of electricity used and when it is used”