
Wholesale Electricity Market – Rule Change Proposal Submission Form

RC_2008_29

Change to curtailable load de-registration timeframe

Submitted by

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Date submitted:	10 October 2008

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 it facilitates retailer participation in DSM through the removal of the risk to retailers that they will retain the DSM obligations attaching to a particular load for six months after the load has transferred to another retailer. This change will also ensure that retailers with DSM Programs can effectively fulfill their Reserve Capacity Obligations by drawing on other available loads in place of churned curtailable Loads.

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 proposal supports market objective (a) by ensuring that retailers can effectively fulfill their Reserve Capacity Obligations by drawing on other available loads in place of churned curtailable loads; and objective (e) by encouraging the participation of DSM.

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.
