

Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2008_30 : Reserve Capacity Security

Submitted by

Name:	Michael Zammit
Phone:	03 8643 5900
Fax:	03 8643 5999
Email:	Michael.zammit@energyresponse.com
Organisation:	Energy Response
Address:	Level 1, 250 Queen St MELBOURNE 3000
Date submitted:	27 October 2007

Submission

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

Energy Response supports the proposed Rule Change, however we would also like to see:

- i) That the Reserve Capacity Security may be provided via a bank guarantee and/or cash deposit (ie combinations of both would be allowed)
- ii) That an end date for bank guarantees is provided

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

Energy Response believes that the greater flexibility provided will simplify the Reserve Capacity Security requirements allowing the applicant to make their arrangements in a variety of ways, each providing a secure and positive outcome. Giving a known end date will greatly assist applying for bank guarantees.



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.

Application costs are borne by the applicant and any additional costs associated with Energy Response's suggested changes would be commensurate with the degree of complexity the applicant would choose.

4. Please indicate the time required for your organisation to implement the change, should it be accepted as proposed.

There is no change required to Energy Response's existing processes. These changes would be of benefit to Energy Response and lead to a net saving in time when next we apply to provide more Reserve Capacity. We also believe that other market participants will similarly benefit when they next apply.