Wholesale Electricity Market – Rule Change Proposal Submission Form

RC_2008_32: Calculation of IRCR

Submitted by

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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 more equitably allocates IRCR costs on a monthly basis to the suppliers of new accumulation meters, which are currently excluded from liability until the annual reset.

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 (b) (to encourage competition among generators and retailers in the South West interconnected system, including by facilitating efficient entry of new competitors).

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.