
Wholesale Electricity Market – Rule Change Proposal Submission Form

RC_2009_07

Rule Change Notice: Under Construction for Reserve Capacity Mechanism

Submitted by

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Submission

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

LGP supports the Rule Change proposal on the grounds that requiring facility “commitment” as a pre-condition for the allocation of capacity credits is more reasonable and appropriate than requiring the facility be “under construction”.

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 Rule Change promotes Market Objective c) *to avoid discrimination in that market against particular energy options and Technologies*) and is otherwise consistent with the other objectives. Further, LGP considers that Market Objective a) (to promote

the economically efficient, safe and reliable production and supply of Electricity) is enhanced because the Rule Change removes the requirement that financiers would otherwise have to accept unnecessarily increased risk via the fact that they must start constructing a project that at the point of commencement does not actually create capacity credits.

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.
