
**Wholesale Electricity Market
Rule Change Proposal Submission Form**

**RC_2009_07 Under Construction for the Reserve Capacity
Mechanism**

Submitted by

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Submission

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

Verve Energy supports the rule change proposed by the Independent Market Operator (IMO) to replace the word “under construction” with “committed” in clauses 4.2.7, 414.6 and Appendix 3 of the Wholesale Electricity Market Rules.

The present rule favours long lead time plant that is “under construction” compared to short lead time plant that may be as equally committed. The proposed changes will reduce this discrimination.

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

Verve Energy agrees the change will help with the achievement of Market Rules objective
(c)....to avoid discrimination in that the market against particular energy options.....

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.

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