
Wholesale Electricity Market – Rule Change Proposal Submission Form

RC_2009_08 Updates to Commissioning Provisions

Submitted by

| | |
|------------------------|--|
| Name: | Graeme Alford |
| Phone: | 9475 0144 |
| Fax: | 9475 0173 |
| Email: | graeme.alford@landfillgas.com.au |
| Organisation: | Landfill Gas & Power Pty Ltd |
| Address: | PO Box 861 CLOVERDALE WA 6985 |
| Date submitted: | 10 June 2009 |

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 an efficient and effective market should permit commissioning generators reasonable operational flexibility and immunity from financial impost. In particular:

- New Generators should not be ineligible for applying for a Commissioning Test solely because they are already registered.
- Commissioning Test status should not be prohibited after 30 November of the Capacity Year.
- New generators should be permitted to synchronise without a Resource Plan or Dispatch instruction.
- Commissioning generators should not be required to lodge Resource Plans and should not be exposed to UDAP and DDAP payments.
- New generators should be liable for Capacity Refunds after 30 November.

While LGP accepts the 4 month limit from first synchronisation on the granting of Commissioning Tests as being a pragmatic improvement on the current situation, we note that a commissioning generator has sufficient incentives to complete commissioning as fast as possible and we question the appropriateness of the 4 month limit, rather than no limit at all.

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

LGP considers that by allowing a new Facility operating flexibility and immunity from energy imbalance penalties, the proposal supports market objectives (a) (to promote the economically efficient, safe and reliable production and supply of Electricity) and (b) *(to encourage competition among generators and retailers, 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.
