
Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2009_08 Updates to Commissioning Provisions

Submitted by

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Submission

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

Synergy supports Rule Change Proposal RC_2009_08, which proposes to amend the Market Rules so as to allow for the late (post 30 November) commissioning, of up to four months after first connection to the SWIS, of new generators.

In particular, Synergy supports permitting these new generators to conduct commissioning tests without:

- Operating in the energy market;
- Submitting Resource Plans; and
- Being subject to Upward Deviation Administered Price (**UDAP**) and Downward Deviation Administered Price (**DDAP**).

Removing the UDAP and DDAP until four months after first connection will reduce the financial risk associated with entering the market and potentially increase generation competition.

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

Synergy agrees that the proposed changes will support Wholesale Market Objective (b) by facilitating the 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 in implementing these changes.

Synergy would not require any changes to IT or business systems nor incur any organisational costs as a consequence of adopting the proposed change.

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

Synergy would be able to implement this rule change immediately.
