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## Wholesale Electricity Market – Rule Change Proposal Submission Form

**RC\_2009\_15**

**Removal of ERA Time Limit to Publish Investigation Results**

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### Submitted by

<b>Name:</b>	Graeme Alford
<b>Phone:</b>	9475 0144
<b>Fax:</b>	9475 0173
<b>Email:</b>	<a href="mailto:graeme.alford@landfillgas.com.au">graeme.alford@landfillgas.com.au</a>
<b>Organisation:</b>	Landfill Gas & Power Pty Ltd
<b>Address:</b>	PO Box 861 CLOVERDALE WA 6985
<b>Date submitted:</b>	30 April 2009

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### Submission

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

LGP supports the Rule Change proposal on the grounds that where investigations are required, the principal objective should be that they be conducted properly rather than to a deadline. In particular, issues are potentially complex and it is not practicable for the ERA to conclude all investigations within 20 business days. The application of such a deadline therefore potentially places the ERA in breach of the Market Rules or compromises the integrity of the investigation. In particular, if the ERA finds against a market participant, it is important that the integrity of the ERA be maintained for which it should demonstrate that it has followed due process. The alternative is for adversely affected participants to be provided with a claim that the conclusion is erroneous due to unreasonable time pressure. In addition to negating the intent of the time limit, this would also undermine the integrity of the ERA in general.

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

LGP supports the ERA's contention that the Rule Change proposal furthers objectives a) *to encourage competition among generators and retailers* and d) *to minimise the long-term cost of electricity*.

In particular, the proposed will facilitate the governance of competitive behaviour and discourage anomalies.

LGP considers that the proposal is consistent with the other Market Objectives.

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**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.

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**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.

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