

---

---

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

**RC\_2009\_17 Transparency of Capacity Credit Allocations**

---

---

**Submitted by**

<b>Name:</b>	Catherine Rousch
<b>Phone:</b>	6212 1125
<b>Fax:</b>	
<b>Email:</b>	Catherine.Rousch@synergy.net.au
<b>Organisation:</b>	Synergy
<b>Address:</b>	228 Adelaide Terrace Perth 6000
<b>Date submitted:</b>	21 August 2009

---

---

**Submission**

---

---

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

Synergy supports Rule Change Proposal RC\_2009\_17, which would ensure publication by the IMO of the Capacity Credits held by each Market Participant in relation to each Facility, rather than an aggregate summary for each Market Participant as is the current practice. This will increase the level of transparency with respect to the number of Capacity Credits held by individual Facilities.

In particular, Synergy is pleased that the Rule Change Proposal now provides that, in the case of a Market Participant with a Demand Side Programme, the IMO is to publish the total Capacity Credits for that programme ie an aggregate value rather than a value for each Curtailable Load. The list of Curtailable Loads may change considerably between registering the capacity commitment and supply during the Capacity Year.

---

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

Synergy agrees that the proposed changes will better address Wholesale Market Objectives (a), (b) and (c).

---

**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.

---