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

RC_2009_22 The use of tolerance levels by System Management

Submitted by

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| Date submitted: | 13 November 2009 |

Submission

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

Synergy supports Rule Change Proposal RC_2009_22, which is aimed at clarifying System Management's reporting obligations. Synergy agrees that this rule change will provide greater transparency with regard to the monitoring and reporting of alleged breaches of Market Participants to the IMO.

The current, legal interpretation, of Market Rule 2.13.6 is that all alleged breaches, no matter how trivial, must be reported by System Management to the IMO. Synergy agrees with System Management's current approach of, with the knowledge of Market Participants, implementing a tolerance range before reporting alleged breaches to the IMO. As such, Synergy supports the proposed changes, which will give System Management greater clarity regarding its reporting obligations.

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

Synergy agrees that the proposed changes will be consistent with the Market Objectives, in particular with Market Objectives (a), (b) and (d).

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.
