
**Draft Rule change Report RC_2009_35
Energy Price Limits Methodology and Consultation Process**

Submitted by

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Submission

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

LGP supports the IMO's draft decision to proceed with the Rule Changes as modified after the first round of consultation.

Our only comment is to query the presumption in clause 6.20.7 b v, that there is a unique marginal loss factor for a 40 MW open cycle gas turbine generating station relative to the Reference Node. We understand that the loss factor is location dependant and, in the spirit of assessing a maximum price, would suggest using the highest figure pertaining to an established generator.
