Equipment Tests Ref: RC_2009_37

Submitted by

Name:	Graeme Alford
Phone:	9475 0144
Fax:	9475 0173
Email:	graeme.alford@landfillgas.com.au
Organisation:	Landfill Gas & Power Pty Ltd
Address:	PO Box 861 CLOVERDALE WA 6985
Date submitted:	29 June 2010

Submission

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

LGP supports the Rule Change on the grounds that generators need to conduct tests and the denial of such a facility forces them to improvise in a clandestine manner with a consequent threat to system security. In particular, resource plans measure average output over a 30 minute interval, which could lead to perverse outcomes in the final minutes as the generator seeks to correct for the consequences of the test. Instead, the proposal empowers System Management to approve and manage tests, thereby maintaining system security and relieving System Management of unreasonable policing oversight.

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

LGP supports System Management's contention that the rule change supports Market Objective a) through the achievement of transparency. It also improves the integrity of the Market Rules.

 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.

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.

Email: imo@imowa.com.au www.imowa.com.au