

## Wholesale Electricity Market Rule Change Proposal Submission Form

## RC 2009 37 Equipment Tests

## Submitted by

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## **Submission**

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

Synergy supports Rule Change Proposal RC\_2009\_27, which will act to introduce an Equipment Test whereby a participant may seek, in advance, approval by System Management to deviate from its Resource Plan to conduct a test of equipment to verify Standing Data, resolve technical performance issues or confirm capability of Ancillary Services.

Synergy agrees that, at various times, a Facility may need to undertake testing of equipment. Synergy also agrees that the current commercial penalties, including DDAP and UDAP, should still apply.

However, Synergy is concerned that such testing could result in changes to MCAP, potentially exposing Market Participants to higher than expected balancing costs. Synergy would therefore be wary of facility testing at times and under circumstances that could result in liquid MCAP. Synergy would therefore prefer that, when System Management decides whether or not to approve an Equipment Test request, it takes into account the likelihood of such an MCAP outcome.

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



Synergy agrees with System Management that the proposed changes will be consistent with Market Objective (a).

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.