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

RC_2010_03 Calculation of Net STEM Shortfall

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_2010_03, which will act to remove Curtailable Loads from the calculation of a Market Participant's Net STEM Shortfall.

However, Synergy agrees with the IMO that this is an interim solution only; Synergy believes that the rules relevant to the calculation of Net STEM Shortfall need a full reassessment. To this end, Synergy would support the formation of a working group to specifically assess the ongoing requirement concerning Net STEM Shortfall calculations and to determine the nature of such formulation.

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

Synergy believes that the proposed changes will be consistent with Market Objectives (a), (b), (c) 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.
