

---

## Wholesale Electricity Market Rule Change Proposal Submission Form

### RC\_2010\_06 Application of Spinning Reserve to Aggregated Facilities

---

#### Submitted by

<b>Name:</b>	Catherine Rousch
<b>Phone:</b>	6212 1125
<b>Fax:</b>	
<b>Email:</b>	Catherine.Rousch@synergy.net.au
<b>Organisation:</b>	Synergy
<b>Address:</b>	228 Adelaide Terrace Perth 6000
<b>Date submitted:</b>	24 August 2010

---

#### Submission

---

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

Synergy supports Rule Change Proposal RC\_2010\_06 and the additional amendments to the Market Rules proposed by the IMO in the Draft Rule Change Report which will act to remove the current bias whereby aggregated Facilities may incur a greater proportion of Spinning Reverse services payment costs under Appendix 2 than they would if they were treated as non aggregated Facilities.

Synergy suggests one minor amendment to the proposed amendments to Appendix 2, dot point three (~~deleted text~~, added text):

- If facility f is a Scheduled Generator that is the sum of more than one aggregated ~~Facilities~~ Facility, each with an interval meter and each injecting energy at an individual connection point to the South West interconnected system, then each individual Facility is treated as an individual Scheduled Generator under Appendix 2.

---

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

Synergy believes that the proposed changes will better facilitate the achievement of Market Objectives (a), (b) and (d):

(a) *to promote the economically efficient, safe and reliable production and supply of electricity and electricity related services in the South West interconnected system;*

(c) *to avoid discrimination in that market against particular energy options and technologies, including sustainable energy options and technologies such as those that make use of renewable resources or that reduce overall greenhouse gas emissions;*

(d) *to minimise the long-term cost of electricity supplied to customers from the South West interconnected system.*

---

**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.

---