Application of Spinning Reserve to Aggregated Facilities RC 2010 06

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: | 14 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 aggregation of separate facilities does not impact the contribution of those facilities to the requirement for spinning reserve.

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

LGP supports Griffin's contention that the rule change advances Market Rules a)(economically efficiency) and d) (minimise the long-term cost of electricity) by avoiding increasing the costs of aggregated facilities when they do not increase the market costs.

 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.