
Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2010_06 Application of Spinning Reserve to Aggregated Facilities

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_06, 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 if they would if they were treated as non aggregated Facilities.

Aggregating Facilities is undertaken for practical reasons, such as the convenience of placing a single Resource Plan, but doing so does not increase the Spinning Reserve risk nor reduce system reliability. If, by aggregating Facilities, the aggregated Facility moves to a higher category of the Spinning Reserve charge, then Spinning Reserve liability is unfairly apportioned to that aggregated Facility.

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

Synergy agrees with Griffin Energy that the proposed changes will be consistent with Market Objectives (a), (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.
