
Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2010_15 MAC Membership Review

Submitted by

Name:	Catherine Rousch
Phone:	6212 1125
Fax:	
Email:	Catherine.Rousch@synergy.net.au
Organisation:	Synergy
Address:	228 Adelaide Terrace Perth 6000
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Submission

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

Synergy does not object to RC_2010_15 and the amendments proposed by the IMO in the Draft Rule Change Report.

Synergy would like to propose a further amendment to formalise the IMO's comment in the Draft Rule Change Report that the IMO, in making appointment decisions to the Market Advisory Committee (**MAC**), *will ensure that the number of Market Generator representatives remains equal to the number of Market Customer representatives* (page 8). To this end, Synergy proposes the additional amendment as presented below (added text):

2.3.5. (i) The number of Market Generator representatives must equal the number of Market Customer representatives.

: For further feedback, the IMO has raised the following two queries:

- (i) Whether the existing number of representatives on the MAC adequately represents the Market Participants they are intended to; and
- (ii) Whether the existing representation does not cover a specific category of Market Participants.

In response, Synergy offers the following comments:

Regarding the IMO's first query, Synergy believes that the current size of the MAC, with eleven members plus two permanent observers, is a workable size for ensuring the resolution of matters referred to it and considers that the existing number of representatives adequately represents the Market Participants as intended.

Regarding the IMO's second query, Synergy believes that the existing representation on the MAC sufficiently covers the categories of Market Generator, Market Customer, System Management, Network Operator and the IMO. Synergy considers that only a Market Generator or a Market Customer carrying out the full functions of a generator or retailer in the Wholesale Electricity Market (**WEM**) should perform a Market Generator or Market Customer function on the MAC. Synergy notes that a number of energy aggregators are registered as Market Customers in accordance with clause 2.28.13 of the Market Rules. Energy aggregators are not regulated entities and Synergy considers that any Market Customer delegate on the MAC should represent a regulated retail entity performing the full range of retail activities.

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

On balance, Synergy does not consider that increased MAC membership will better facilitate achievement of the Market Objectives. Where issues relevant to a particular sub category of the market are considered, current protocol allows interested parties to request attendance at MAC meetings to present their views. Synergy would prefer that these arrangements continue rather than the MAC being expanded on a permanent basis.

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.

Should RC_2010_15 be accepted, 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.

Should RC_2010_15 be accepted, Synergy would be able to implement this rule change immediately.
