Updates to Reserve Capacity Obligation Provisions Ref: RC_2010_16

Submitted by

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Submission

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

LGP supports the Rule Change on the grounds that it corrects a manifest error that would otherwise implement previous rule changes so as to adversely impact new generators whose development commenced before the previous rule change was effected.

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

LGP supports the IMO's contention that the proposed changes are consistent with the Market Objectives. We also consider that the changes will improve the integrity of the Market Rules by avoiding regulatory risk in respect of this issue.

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

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.