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**Wholesale Electricity Market  
Rule Change Proposal Submission Form**

**RC\_2010\_22 Partial Commissioning of Intermittent Generators**

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**Submitted by**

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<b>Date submitted:</b>	15 April 2011

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**Submission**

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

Collgar supports the changes proposed in this rule change and believes that it corrects a manifest error in the market rules when relating to intermittent generators.

In particular Collgar supports the proposal that a Facility may indicate its level of capacity obligations either by:

- (a) The metered output of the Facility; or
- (b) The equivalent percentage of the Facility that has been constructed as indicated by the most recent expert report provided to the IMO.

Collgar believes that this is an appropriate and equitable methodology.

In particular, Collgar believes that the flexibility provided by the introduction of (b) above reduces the likelihood that new intermittent generators might be unduly penalised. Collgar notes that this option is not presented as a worked example in the proposed change and would suggest that the IMO include a worked example of (b) as well to avoid confusion.

Collgar notes that the concepts of Required Level and Commercial Operation are covered by RC\_2010\_12. To that end Collgar supports Perth Energy's views that it would be preferable for RC\_2010\_12 and RC\_2010\_22 to be combined to avoid confusion. In saying this, Collgar notes the IMO's response to this that both proposals are being progressed in parallel but

does not believe RC\_2010\_22 should be unnecessarily delayed in being implemented should there be delays to the implementation of RC\_2010\_12.

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

Collgar believes it will better address market objective (c) and is consistent with the other market objectives.

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**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.**

N/A

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**4. Please indicate the time required for your organisation to implement the change, should it be accepted as proposed.**

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N/A