
Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2010_24 Adjustment of Relevant Level for Intermittent Generation Capacity

Submitted by

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Submission

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

Verve Energy supports this Rule Change, subject to the amendments detailed below (highlighted in **bold font**).

Subclause 4.11.3A (cA) should be expanded to capture the scenario where an Intermittent Generator within Verve Energy's portfolio may be dispatched down by System Management without a Dispatch Instruction as defined in the Market Rules. This subclause should therefore be amended as follows:

If evidence is provided by the Market Generator that during the period described in step (a), the amount of electricity (in MWh) sent out by the Facility was reduced because the Facility complied with a Dispatch Instruction from System Management **or in the case of a Facility registered by the Electricity Generation Corporation as dispatched down by System Management,** or because of a Planned Outage or a Consequential Outage, estimate the amount of electricity (in MWh) that would have been sent out by the facility, had it not complied with the ~~Dispatch Instruction~~ **Dispatch Instruction instruction from System Management** or been affected by a Planned Outage or a Consequential Outage.

A further amendment should be made to subclause (d) as the fixed number of 52,560 is slightly overstating the Certified Reserve Capacity to be assigned. This number assumes there is no leap year in the three years covered in subclause (a). A more accurate Relevant Level would be set if the subclause is changed to:

(d) set the Relevant Level as double the sum of the quantities determined in (b), and (c) and (cA) divided by ~~52,560~~ **the number of Trading Intervals in the three years in (a).**

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

This Rule Change is consistent with the Market Objectives.

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.

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