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

**RC\_2010\_25 Calculation of the Capacity Value of Intermittent  
Generation – Methodology 1 (IMO)**

**RC\_2010\_37 Calculation of the Capacity Value of Intermittent  
Generation – Methodology 2 (Griffin Energy)**

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**Submitted by**

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<b>Date submitted:</b>	25 November 2011

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**Submission**

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

Wind Prospect has been observing the introduction of the market rule change RC\_2010\_25 and can provide the following comments:

- Wind Prospect does not support RC\_2010\_25 in its current modified form
- RC\_2010\_25 has been significantly modified from the original version and should be withdrawn and a new rule change proposed
- Wind Prospect does not support the U-factor adjustment as it is inappropriate and has no clear basis
- Wind Prospect does not support the LSG method as it is inconsistent with the treatment of other generation types in the SWIS
- Any modelling should include data from the Collgar wind farm

- The rule change should consider with greater weight the outcome of the research undertaken by MMA which showed a strong correlation between performance of Western Australian wind farms and demand during summer peak intervals

Wind Prospect understands the importance of security of supply on the SWIS, but does not believe this should be achieved by changing the investment incentives through the Reserve Capacity system. A change of the current methodology will have a disproportionate impact on investment in wind energy in Western Australia.

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

The current proposed RC\_2010\_25, if implemented, will provide an unfair disincentive for investment in renewable energy projects in Western Australia and should be withdrawn. Wind Prospect believes RC\_2010\_25 is not consistent with the overall market objectives of avoiding discrimination.

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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.**

No comment.

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

No comment.

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