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## Wholesale Electricity Market Rule Change Proposal Submission Form

### RC\_2010\_28 Capacity Credit Cancellation

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#### Submitted by

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#### Submission

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

Synergy supports Rule Change Proposal RC\_2010\_28, which acts to amend the Market Rules to cancel the Capacity Credits for a new Facility if it is anticipated that the Facility will be unable to deliver its capacity to the Wholesale Electricity Market for the entire Capacity Year. In such a situation, the IMO would be able to draw down and distribute any Reserve Capacity Security held for that Facility.

It is proposed that any decision by the IMO to cancel a Market Participant's Capacity Credits would be reviewable on appeal to the Electricity Review Board and that this decision would be included in the list of reviewable decisions in the Electricity (Wholesale Electricity Market) Regulations 2004 (**Regulations**). Synergy makes the comment that Rule Change Proposal RC\_2010\_28 should not commence until after the Regulations have been appropriately changed or a Market Participant will be unable to appeal a decision by the IMO to cancel its Capacity Credits.

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

Synergy believes that the Rule Change Proposal will allow the Market Rules to better address Market Objectives (a) and (d):

- (a) *to promote the economically efficient, safe and reliable production and supply of electricity and electricity related services in the South West interconnected system;*

*(d) to minimise the long-term cost of electricity supplied to customers from the South West interconnected system.*

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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.**

Synergy would not require any changes to IT or business systems, nor incur any organisational costs as a consequence of adopting the proposed change.

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

Synergy would be able to implement this rule change immediately.

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