
RC_2010_29 Curtaileable Loads and Demand Side Programmes

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 Changes Proposal as follows.

Issue 1: Registration of Curtaileable Loads. LGP supports the removal of the concept of a CL as a Registered Facility from the Market Rules and replacement with the concept of the DSP being the Registered Facility and having the NDLS associated with it for the purposes of capacity obligations, dispatch and settlements.

Issue 2: Facility Definition. LGP supports the IMO's contention that for the purposes of the RCM, the material aspect is evidence that the Facility has the capacity to be dispatched to the level of Capacity Credits held by the Facility. We also support the proposal to remove the cumbersome, inefficient and restrictive practice of requiring individual CL's to be registered and to individually receive Dispatch Instructions. The DSM Provider adds value by organizing a collective of small loads and acting as the Principal Point of Contact with the IMO and System Management and this role should be facilitated rather than obstructed.

Issue 3: Market Fees LGP supports the IMO's contention that DSPs should not be required to pay Market Fees (12 May 2010 meeting).

Issue 4: Measurement of CL Performance. LGP supports the proposal that the RD level calculation methodology should be changed to be calculated on the IRCR intervals; the exclusion due to maintenance be removed; and the RD level should be calculated based on the aggregated output of the DSP.

Issue 5: Capacity Cost Refunds

LGP supports the proposal that a DSP be liable to pay refunds if at any time its program is not filled completely at the amount of the shortfall, including times when this is the result of a component Facility being on a Forced Outage.

Issue 6: Reserve Capacity Security. [Not Applicable]**Issue 7: Stipulated Default Loads**

LGP supports the proposal that the Market Rules be amended to combine the concept of a CL and Stipulated Default Load (SDL) into the DSP concept, and that the DSP's level of Capacity Credits would be based on the most recent summer's data, instead of data from two years previously in the case of the SDL.

Issue 8: Potential Double Payment

The IMO proposes that DSPs not be paid for any energy reduced during either a Reserve Capacity test or Verification Test.

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

LGP supports the changes on the basis of being necessary to improving the integrity, administration and practicality of the participation of Demand Side Management in the WEM.

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 changes.

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.