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## Wholesale Electricity Market Rule Change Proposal Submission Form

### <RC\_2010\_25 and RC\_2010\_37: Calculation of the Capacity Value of Intermittent Generation – Methodology 1 and 2B>

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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.

Our concern is that the studies for both proposals focused on the output of windfarms in WA and the load on the SWIS, however, both excluded Collgar.

This is a serious omission for two reasons;

1. Collgar is as big as all the other windfarms on the grid put together.
2. Collgar, unlike all the other windfarms, is NOT on the coast. It is 300km inland.

It could be expected that these reasons would have a substantial impact on the results of the studies. This also applies to the work of Dr Tooth. Without Collgar, the numbers mean little.

We suggest that the studies be redone with Collgar data before any further decision making or proposals are submitted. And as the extension to Albany, Grasmere and the Mt Barker windfarm will be operating this summer, data from these two should also be included.

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

Whatever the result of modelling as suggested above will be, it will be a better result simply because it better reflects what is in the ground.

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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.**

NA

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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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