

Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2011_08 Curtailable Load Dispatch for NCS and changes to the RCOQ for Curtailable Loads under certain circumstances

Submitted by

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Date submitted:	18 August 2011

Submission

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

Synergy supports Rule Change Proposal RC_2011_08, which acts to ensure that:

- (i) The current limitation that may prevent dispatch of a Curtailable Load for Network Control Service is removed; and
- (ii) The Reserve Capacity Obligation Quantity (**RCOQ**) for a Curtailable Load is not affected by any Network Control Service Contract, Ancillary Service Contract, Balancing Support Contract or test of equipment.

Synergy agrees with System Management that the dispatch of a Curtailable Load should only count towards its annual activation limit if it is called for system security purposes per clause 7.6.1. As the market pays for dispatch under clause 7.6.1 via the Reserve Capacity Mechanism, it is necessary that the RCOQ is reserved for this purpose.

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 Objective (a):



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

by ensuring Curtailable Load is available when it is most needed i.e. during periods when system security is at risk.

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.

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.