
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:	17 October 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) System Management's ability to dispatch a Demand Side Programme (DSP) pursuant to clauses 7.6.6(a)–(d) is not affected or constrained by the Facility's Reserve Capacity Obligations;
- (ii) In determining a DSP's Reserve Capacity Obligation Quantity (**RCOQ**) under clauses 4.12.4(c) or 4.12.8 only dispatches under clause 7.6.6(e) are taken into consideration; and
- (iii) Capacity Shortfalls for a DSP as calculated under clause 4.26.2D are set to zero where System Management has not issued Dispatch Instructions under clause 7.6.6(e).

Synergy agrees with System Management that dispatch of a DSP other than under clause 7.6.6(e) should in no way be constrained or limited by its RCOQ as determined under the Market Rules. Further, Synergy supports the rule change proposal which will amend the Market Rules to ensure that only dispatch under clause 7.6.6(e) is taken into account in determining a DSP's RCOQ.

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 that DSP Reserve Capacity Obligations are preserved and remain available to the market in circumstances where the system is under stress, as contemplated under clauses 7.6.3 and 7.6.4, irrespective of any obligation arising in respect of clause 7.6.6 (a)-(d).

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.
