RC_2012_3: Assignment of Capacity Credits to Network Control Services Facilities

Submitted by

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Submission

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

Community Electricity supports the Rule Change Proposal on the grounds that it harmonises the participation of NCS Facilities in the Reserve Capacity Mechanism and more efficiently integrates the Wholesale Electricity Market with management of the South West Interconnected Network. In particular, there is similarity between an NCS Facility and a Scheduled Generator for peaking duty and insofar as is reasonable they should be treated similarly. The proposal facilitates access by the NCS Facility to the independent high quality revenue streams of the Capacity Mechanism and Network Operation in return for the facility making its fullest contribution to both, without impairment of either. Conditional on efficient contracting by the Network Operator (to include the capacity revenue stream) this would result in maximum utility at minimum cost.

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

Community considers that the Rule Change enhances achievement of Market Objectives c) [removal of discrimination], a) [reliability and efficiency], b) [promotes competition] and d) [minimisation of cost of electricity]. It is otherwise consistent with e) [demand management].

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

The proposal has no implications for Community.

4. Please indicate the time required for your organisation to implement the change, should it be accepted as proposed Not applicable