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**Wholesale Electricity Market  
Rule Change Proposal Submission Form**

**RC\_2012\_16 Alignment of Settlement Tolerances and Tolerance  
Ranges – Fast Track Rule Change proposal**

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**Submitted by**

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<b>Date submitted:</b>	3 December 2012

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**Submission**

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**1. Please provide your views on the draft report, including any objections or suggested revisions.**

Synergy supports fast track proposed rule change RC\_2012\_16 which acts to rectify a manifest error whereby Scheduled Generators are eligible to receive compensatory payments (Constrained-on/Constrained-off) in circumstances where they generate at a level within their Tolerance Range but which is outside their Settlement Tolerance Range.

Synergy accepts that as a matter of practical application a level of tolerance, over a Trading Interval, is applied when determining whether a facility has met its Dispatch Instruction and also that it was an unintended consequence of RC\_2011\_10 that the Tolerance Range for a facility could be greater than its Settlement Tolerance Range thus creating circumstances where a facility could receive an additional compensatory payment (Constrained-on/Constrained-off) while remaining compliant its Resource Plan and within its Tolerance Range.

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

Synergy agrees with the IMO's assessment that correcting a manifest error to remove an intended compensatory payment is consistent with the Wholesale Market Objectives, in particular objective (a) as the removal of these unintended compensatory payments will

reduce inefficient and unjustified costs borne by the market and hence improve efficiencies in generation of electricity.

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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.**

Synergy notes that the proposed change will not have any impact on its business or IT systems.

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- 4. Please indicate the time required for your organisation to implement the change, should it be accepted as proposed.**