

---

---

## Wholesale Electricity Market Rule Change Proposal Submission Form

### RC\_2012\_19 Constrained On/Off Payments to non-scheduled generators

---

---

#### Submitted by

<b>Name:</b>	Shane Cremin
<b>Phone:</b>	07 3323 6093
<b>Fax:</b>	02 9693 0093
<b>Email:</b>	<a href="mailto:shane.cremin@apa.com.au">shane.cremin@apa.com.au</a>
<b>Organisation:</b>	APA Group
<b>Address:</b>	GPO Box 1390, Brisbane Qld 4001
<b>Date submitted:</b>	05/12/2012

---

---

#### Submission

---

---

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

APA Group (APA) supports the proposed rule change as a necessary fix of an issue brought about due to the introduction of previous important rule changes.

While it is always preferable to identify such issues in the initial rule change process (in this case, RC\_2011\_10), the complexity of RC\_2011\_10 makes it unsurprising that inconsistencies such as this arise. APA agrees that the issues referred to in RC\_2012\_19 represent a manifest error and so supports the use of the fast-track rule change process.

---

---

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

The proposed rule change is required to make good previous rule changes concerned with introducing competitive balancing to the WEM. As such, it will indirectly better facilitate the market objectives via the operation of the competitive balancing market.

- 
- 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.**

APA has no applicable costs of changes to identify.

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

Not applicable.

---