RC_2013_6: Exclusion of LFAS Quantities from Daily Ancillary Service Files

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 corrects a manifest error that otherwise maintains an impracticable legacy requirement and potentially removes generating capacity from the STEM auction resulting in elevated prices.

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

Community considers that the Rule Change is required to preserve the integrity of the Market Rules. We support the IMO's contention that the change supports Market Objectives b (to encourage competition) and d (minimising electricity cost), and is otherwise consistent with all the Market Objectives.

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