

Wholesale Electricity Market Rule Change Proposal Submission

RC_2018_03

Capacity Credit Allocation Methodology for Intermittent Generators

Submitted by

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Submissions on Rule Change Proposals can be sent by:

Email to: rcp.secretariat@rcpwa.com.au

Post to: Rule Change Panel
Attn: Executive Officer
C/o Economic Regulation Authority
PO Box 8469
PERTH BC WA 6849

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

Community Electricity sympathizes with the logic of the rule change proposal but suggests that the proposal should be declined on the grounds that it conflicts with the ERA's prospective broader review of the mechanism for assessing the Relevant Level, scheduled to commence in a few months time.

We consider that to proceed would be a misallocation of scarce resources.

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

Community Electricity objected from the outset to the use of LSG and U&K parameters and we consider that the demand and supply side of the capacity mechanism should be better integrated around a common focus, such as the peak system load. However, we note that

the current approach was intended as an interim measure pending further assessment of intermittent generator performance during a 1-in-10 summer. Such a summer is now available for analysis and we consider that the issue should be holistically assessed. Consequently, we consider that this is not the proper venue for conducting or preempting that assessment.

- 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.**

None

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

Not applicable
