

---

---

## Wholesale Electricity Market – Rule Change Proposal Submission Form

### <RC\_2007\_02> <Intermittent Generator Downward Dispatch Amendment>

---

---

#### Submitted by

<b>Name:</b>	Jenni Conroy
<b>Phone:</b>	62121661
<b>Fax:</b>	62121035
<b>Email:</b>	Jenni.conroy@synergyenergy.com.au
<b>Organisation:</b>	Synergy
<b>Address:</b>	228 Adelaide Terrace Perth
<b>Date submitted:</b>	21 June 2007

---

---

#### Submission

---

---

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

Alinta raises two issues in its proposal.

The first issue relates to current differences in how the Market Rules treat Scheduled Generators and Non-Scheduled Generators in regard to dispatch instruction payments.

Synergy acknowledges that under the current Market Rules, Non Scheduled Generators could be adversely impacted in instances where  $MCAP > 0$ . Synergy supports the analysis undertaken by Alinta in this regard that the Bid Price for a downward dispatch instruction may be a negative value, while MCAP is a positive value and that therefore, under the current Market Rules, a Non-Scheduled Generator may be unfairly penalised for complying with a downward dispatch instruction. On this basis, Synergy supports the approach taken in this rule change proposal to define the quantity as a negative quantity

The second issue relates to how the downward dispatch quantity is calculated when a Non-Scheduled Generator is dispatched down. Alinta raises the concern that under the current clause 7.7.5A, a Non-Scheduled Generator may be disadvantaged in the circumstances of a particular combination of a level of downward Dispatch Quantity, the submitted Resource Plan Quantity and a potentially estimated output for the dispatch period. Synergy acknowledges this concern and the analysis undertaken by Alinta which shows that the disadvantage will occur in cases where the estimated output is higher than the quantity specified in the Resource Plan. Synergy supports the approach taken in this rule change proposal to determine how the downward dispatch quantity is calculated.

---

---

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

The objectives of the WEM are clearly enunciated as:

- a. to promote the economically efficient, safe and reliable production and supply of electricity and electricity related services in the South West interconnected system;
- b. to encourage competition among generators and retailers in the South West interconnected system, including by facilitating efficient entry of new competitors;
- c. to avoid discrimination in that market against particular energy options and technologies, including sustainable energy options and technologies such as those that make use of renewable resources or that reduce overall greenhouse gas emissions;
- d. to minimise the long-term cost of electricity supplied to customers from the South West interconnected system; and
- e. to encourage the taking of measures to manage the amount of electricity used and when it is used.

Synergy sees this proposal as being consistent with the WEM objectives, by facilitating c. (above) – avoiding discrimination in that market against particular energy options and technologies.

---

---

**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**

Synergy does not anticipate that this change will require any modifications to existing Synergy systems and processes.

---

---

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

Nil