### Wholesale Electricity Market – Rule Change Proposal Submission Form

RC\_2008\_02 Rule Change Notice: ST PASA Fuel Supply Issues Notification

### Submitted by

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#### **Submission**

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

LGP supports the proposed Rule Change on the grounds that System Management should not be required to perform activities that it cannot satisfactorily fulfill. LGP supports System Management's contention that fuel supply limitations will not necessarily affect particular generation facilities or have a readily predictable effect on the system margin, and therefore the impact upon available generation, cannot be adequately represented in ST PASA. Moreover, System Management's practice of releasing a Dispatch Advisory in any case fulfils the intent of the obligation.

LGP supports System Management's proposal that 3.17.9 (h) be deleted.

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

LGP supports System Management's contention that the rule change would increase the certainty of the application of the rules, and aid economically efficient outcomes through the removal of an obligation which cannot be satisfied.

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

LGP would incur no organisational costs as a consequence of adopting the change.

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

LGP would be able to implement this Rule Change immediately.

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