
Wholesale Electricity Market – Rule Change Proposal Submission Form

**RC_2008_25
Intermittent Load Refund Maximum**

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 as it is not appropriate for an Intermittent Load to have its capacity refunds (that is, payments to the market) capped as though the load were a generator at a capacity nominated by the load itself; rather the load should pay for the utilization of network capacity on the basis of its actual draw.

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

LGP supports the IMO's contention that the proposal supports market objective (a) (promoting the reliable production and supply of electricity and electricity related services) by ensuring that Intermittent Loads contribute to a more equitable share of the reserve capacity cost.

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.
