
Wholesale Electricity Market – Rule Change Proposal Submission Form

RC_2008_28

Eligible Services for Supplementary Reserve Capacity

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 it permits a generator that has commissioned new capacity before the date on which its reserve capacity obligations commences to make that capacity available in the event of Supplementary Reserve Capacity (SRC) being required. Further, the proposed change includes appropriate safeguards to prevent gaming, whereby a generator could otherwise cause an SRC requirement by withholding its capacity from the intended process and then achieving a higher price for it via the SRC.

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 objectives by avoiding the exclusion of bone fide capacity from participating in SRC.

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.
