## Wholesale Electricity Market – Rule Change Proposal Submission Form

### IMO Notice No.: RC\_2008\_30 Report Title: Rule Change Notice: Reserve Capacity Security

#### 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:

- i) it is more appropriate for the market participant to apply to the IMO for release of its security deposit rather than have the IMO actively monitoring the operation, and
- ii) the IMO needs proper time to investigate the participant's application for return of the security, and
- iii) the rules should also capture DSM and the incremental part of new facilities rather than the entire facility.
- 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) (*to promote the economically efficient, safe and reliable production and supply of* electricity and electricity related services) by improving clarity in the processes of the Reserve Capacity Mechanism.

# 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.