Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2009_03 Provision of intermittent generator forecast information

Submitted by

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Submission

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

Synergy does not object to the proposed addition of the words "Unless otherwise directed by System Management" be included into WEM rule 7.2.5.

Synergy raises the point that System Management upon exercising its discretion in removing the forecasting requirement from Intermittent Generators with an intention to reinstate the obligation at a future date, ensures it allows sufficient time such that the Intermittent Generators can arrange their systems to be able to provide a forecast.

At commencement of the WEM many Market Participants strongly expressed the view that such forecasts were required. Given that System Management now questions its relevance suggests the market's earlier view, although well intended, suffered from inexperience. Synergy therefore suggests that System Management may instead, at a future date, decide to create such forecasts for itself rather rely upon Intermittent Generators thereby improving on accurate and relevance. Experience from other jurisdictions suggests energy production forecast accuracy is greatly improved if undertaken within 4 to 8 hours of actual dispatch and Synergy considers the derived benefit from such forecasts would be for system security purposes than market purposes. In conclusion, Synergy accepts the change to WEM rule 7.2.5 and if proposed would have accepted a proposition to remove the rule thereby allowing other forecast solutions to be explored by System Management at their discretion.

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

The proposed rule change promotes the objectives of the market by allowing for the removal of a recognised inefficient process.

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 in implementing these changes.

No cost.

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

Zero time.