
**Wholesale Electricity Market
Rule Change Proposal Submission Form**

**RC_2009_07 Under Construction for the Reserve Capacity
Mechanism**

Submitted by

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Submission

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

This proposed Rule change is a sensible amendment given that in the real world of project development, construction always follows financial commitment – so that the commitment decision by project sponsors (and their lenders in most cases) is the key event which triggers a Notice to Proceed to begin construction. The proposal also complements the Early Certification Rule change – which then allows IMO to assess whether a project is committed well before the usual capacity cycle, but which gives certainty to the project sponsors that the plant will receive capacity credits.

Aviva also supports the consequential amendment proposed by Alinta to amend Rule 4.2.7(b)(ii). This retains consistency for the definition of “committed” throughout the Rules.

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

Aviva considers the proposed Rule change is consistent with Market Objectives (a), (b), (c), (d) and (e).

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.

The proposed Rule change will not result in any increased costs for Aviva.

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

The Rule change can be implemented immediately by Aviva.
