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## Wholesale Electricity Market – Rule Change Proposal Submission Form

### Draft Rule Change Report RC\_2009\_08 Updates to Commissioning Provisions

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#### Submitted by

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<b>Date submitted:</b>	26 August 2009

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#### Submission

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

LGP has reviewed the IMO's Draft Rule Change Report and attended the Public Forum to further discuss this matter.

In particular, we note the additional information from System Management that the cost of system upgrades to support the proposed transparency would be in the region of \$100,000.

LGP continues to support the proposal to extend the commissioning period. We also support in-principle the transparency proposal, but are not positioned to assess the value-for-money; we would look to the large generators that would be affected for guidance on this issue. We would also welcome alternative transparency proposals delivering substantially the same outcome at lower cost.