
Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2010_01 Annual Review of Margin Values

Submitted by

Name:	Catherine Rousch
Phone:	6212 1125
Fax:	
Email:	Catherine.Rousch@synergy.net.au
Organisation:	Synergy
Address:	228 Adelaide Terrace Perth 6000
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Submission

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

As noted in its earlier submission on Rule Change Proposal RC_2010_01, Synergy agrees that enabling the margin values to be updated more frequently than every three years will ensure that they better reflect actual operating conditions, resulting in more efficient market outcomes for both generators and consumers.

With the recent failure of System Management to tender Ancillary Services and given that the Oates Review is proposing that some services be competitive, this rule change may allow others to offer to provide certain services.

As such, Synergy supports the proposed amendments to the Market Rules in the IMO's Draft Rule Change Report concerning Rule Change Proposal RC_2010_01, but suggests the following clarification (added text, ~~deleted text~~):

3.13.3A For each Financial Year, by 31 March of the year prior to the start of that Financial Year ~~in which the Financial Year commences~~, the Economic Regulation Authority must determine values for the parameters Margin_Peak and Margin_Off-Peak, taking into account the Wholesale Market Objectives and in accordance with the following:

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

Synergy agrees with the IMO that the proposed changes will enable the Market Rules to better address Market Objectives (a) and (b).

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.

Synergy would not require any changes to IT or business systems nor incur any organisational costs as a consequence of adopting the proposed change.

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

Synergy would be able to implement this rule change immediately.
