
Certification of Reserve capacity RC_2010_14

Submitted by

Name:	Graeme Alford
Phone:	9475 0144
Fax:	9475 0173
Email:	graeme.alford@landfillgas.com.au
Organisation:	Landfill Gas & Power Pty Ltd
Address:	PO Box 861 CLOVERDALE WA 6985
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Submission

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

LGP supports the several change proposals on the grounds that they incrementally improve and clarify the certification process.

Our only comment is that the proposed solution to issue 11 (Changed to Facility Design) should have proper regard to the materiality of the change and exercise reasonableness in its acceptance; conditional on a Facility delivering the contracted Certified Capacity, the IMO should be flexible in accepting the change and avoid imposing unnecessary costs or constraints.

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

LGP supports the IMO's assessment of the extent to which the various proposals support the Market Objectives.

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.
