
Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2010_22 Partial Commissioning of Intermittent Generators

Submitted by

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Submission

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

Synergy supports Rule Change Proposal RC_2010_22, which acts to ensure that a partially commissioned Intermittent Generator that has neither operated at 100 percent of its Required Level (as defined in RC_2010_12) nor provided a report prepared by an expert accredited by the IMO, but which the IMO considers to be in Commercial Operation, will only be required to make partial, as opposed to full, refunds.

Synergy recognises that circumstances may arise impacting projected Facility building timeframes and supports the proposal for a Market Participant to be permitted to submit a report under clause 4.13.10C (per RC_2010_12) specifying the equivalent percentage of the Facility that has been built for the purposes of refund calculations under clause 4.26.1.

Synergy agrees with the IMO that the introduction of the concept of partial commissioning for Intermittent Generators will better reflect the value of the capacity delivered by them to the Wholesale Electricity Market i.e. Intermittent Generators should only be required to make refunds to the extent that they do not deliver the service that they are paid for.

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

Synergy agrees with the IMO that the Rule Change Proposal will allow the Market Rules to better address Market Objective (c):

(c) to avoid discrimination in that market against particular energy options and technologies, including sustainable energy options and technologies such as those that make use of renewable resources or that reduce overall greenhouse gas emissions.

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.
