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**RC\_2010\_24**

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**Adjustment of Relevant Level for Intermittent Generation Capacity**

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**Submitted by**

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**Submission**

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

LGP notes that this Rule Change proposal addresses issues similar to those of RC 23, which we support as a fast-tracked correction of a manifest error pertaining to Scheduled Generators. We consider the instant rule change RC 24 to be an extension of the latter to the case of Intermittent Generators in the interests of removing discrimination per Market Objective c). LGP is an operator of certified Intermittent Generation and as such would be a beneficiary of the proposed rule change.

LGP also notes that there is a counter-argument to the rule change to the effect that Intermittent Generators are perceived to already receive generous capacity allocations and that the increases arising from the proposed changes would only be minor and do not warrant the complexity. Moreover, the rules are in any case likely to be changed in response to the ongoing market design work. While LGP does not disagree with this, we consider that the proposed rule change is in harmony with the existing rule change context.

On this basis, LGP supports the proposed Rule Change in principle. However, we perceive the specific proposal to be complex in requiring an “estimate (of) the amount of electricity (in MWh) that would have been sent out by the facility, had it not complied with the Dispatch Instruction or been affected by a Planned Outage or a Consequential Outage.” Specifically, we perceive that the process for arriving at the estimate would need to be carefully prescribed, perhaps to the extent of meriting an Operating Procedure. Alternatively, we would suggest that a simpler means of applying the correction be found and would propose as a possibility that the affected intervals simply not be counted in the assessment of the Relevant Demand in the event of the actual Metered Quantities being less than the Relevant Demand.

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

LGP supports the proposed changes as being consistent with the Market Objectives in general and in particular supporting Market Objective c) by removing discrimination against intermittent technologies.

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**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.

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**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.

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