

Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2011_07 Calculation of Net STEM Shortfall for Scheduled 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_2011_07, which acts to ensure that, where a Market Participant operates more than one Scheduled Generator, and one of these suffers a Forced Outage while another is not dispatched, the Market Participant will not be exposed to both a Facility Forced Outage Refund (calculated under clause 4.26.1A) and a Capacity Cost Refund (calculated under clause 4.26.2E) as a result of a Net STEM Shortfall.

Currently, for a Market Participant operating more than one Scheduled Generator, the cost of a Forced Outage in respect of a specific generator is up to twice that which would be incurred had the generator been the only Scheduled Generator registered.

Synergy agrees that this Rule Change Proposal should be progressed under the Fast Track Rule Change Process.

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

Synergy believes that the Rule Change Proposal will allow the Market Rules to better address Market Objectives (c) and (d):



(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;

by ensuring Market Participants with a portfolio of generators are not discriminated against.

(d) to minimise the long-term cost of electricity supplied to customers from the South West Interconnected System:

by removing an extraneous cost from generators which would be passed on to customers.

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.