
**Wholesale Electricity Market
Rule Change Proposal Submission Form**

**RC_2012_19 Constrained On/Off Compensation for Non-Scheduled
Generators – Fast Track Rule Change proposal**

Submitted by

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Submission

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

Synergy supports fast track proposed rule change RC_2012_19 which acts to rectify a manifest error whereby the process by which the out of merit quantities calculated for non-scheduled generators can result in spurious constrained on/off compensation payments being made to or by non-scheduled generators.

Synergy notes that the rules require the IMO to calculate the Maximum and Minimum Theoretical Energy Schedules using Sent Out Metered Schedules determined from SCADA data and when Facility Out of Merit Generation quantities are calculated using Sent Out Metered Schedules, determined from meter data submissions, that spurious quanta can be determined which in turn result in unintended compensation payment amounts.

The proposed remedies, which in the case of calculating Constrained off Compensation, requires that the Downwards Out of Merit Generation amount for non-scheduled generators be set to zero providing System Management has not provided the IMO with the quantity as determined under rule 7.7.5B, and in the case of calculating Constrained on Compensation, requires that the ConP1 price (rule 6.17.3A(b)) be determined to be no less than zero appear robust and appropriate to deal with circumstances where no Constrained On/Off Compensation payments are warranted.

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

As a general principle, Synergy agrees with the IMO's supposition that correcting a manifest error is consistent with the Wholesale Market Objectives. In this case, eliminating the potential for perverse outcomes, in the form of unwarranted Constrained On/Off Compensation payments, to arise from the difference between SCADA/interval meter values, where this is of a spurious nature, would better achieve market objective (b) as it would protect non-scheduled generators from unintended financial impacts (obligation to make constrained on compensation payments to the market) and thus help underpin their financial position, a necessary condition to support competition in the wholesale market.

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 notes that the proposed change will not have any impact on its business or IT systems.

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