## Wholesale Electricity Market Rule Change Proposal Submission Form

## RC\_2008\_31 Under Capacity Credits for Solar Facilities

## Submitted by

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## **Submission**

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

Synergy's purpose in proposing this rule change was to create more relevant methods of calculating capacity credit allocation to differing types of intermittent renewable generation technologies. Clearly wind and solar produce under differing conditions and their contribution at times of system peak would be expected to be different so the rules should reflect this. Synergy's proposed method was a first step in directly addressing solar and Alinta's comments requesting the IMO to undertake a technical study was the next logical step.

Synergy is not wedded to the wording of its proposed rule change or the proposed method for calculating capacity credits for solar facilities; it is simply attempting to establish a reasonable approach.

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

A more reasonable assessment of different intermittent facilities' ability to supply capacity into the SWIS improves market efficiency.

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.

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

Zero time.

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