

Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2008_35 Capacity Refund Mechanism – New Generators

Submitted by

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Submission

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

As noted in Alinta's initial submission, it does not support RC_2008_35. Its views on the proposal have not changed in light of the information contained in the IMO's draft decision and the report prepared for the IMO by McLennan Magasanik Associates (MMA).

Alinta supports the IMO's draft decision to reject RC_2008_35 on the basis that it would reduce incentives for both new and existing generators on outage to make available capacity during the Hot Season, which has the potential to reduce overall system reliability at a time when demand can be expected to be highest.

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

Alinta supports the IMO's draft decision to reject RC_2008_35 on the basis that the proposal is not consistent with the following market objectives:

(a) Promotion of the economically efficient, safe and reliable production and supply of electricity and electricity related services in the South West interconnected system.



- (e) Encouraging the taking of measures to manage the amount of electricity used and when it is used.
- 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.

Alinta does not consider that the changes to the Market Rules contemplated by the proposal would have required it to change its IT or business systems, but supports the IMO's draft decision to reject RC_2008_35.

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

Alinta does not consider that the changes to the Market Rules contemplated by the proposal would have required it to change its IT or business systems, but supports the IMO's draft decision to reject RC_2008_35.