## Removal of DDAP Uplift when less than facility minimum generation RC 2010 08

## Submitted by

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## **Submission**

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

LGP supports the Rule Change on the grounds that Generators operating below their Minimum Generation while ramping to stable operation or shutdown are not capable of responding to price signals or penalties and therefore should not be exposed to these imposts.

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

LGP supports Griffin's contention that the rule change advances Market Rules a)(economically efficiency) c) (avoidance of discrimination) and d) (minimise the long-term cost of electricity.)

 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.

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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