

---

## Wholesale Electricity Market Rule Change Proposal Submission Form

### RC\_2010\_08 Removal of DDAP Uplift when less than facility minimum generation

---

#### Submitted by

<b>Name:</b>	Catherine Rousch
<b>Phone:</b>	6212 1125
<b>Fax:</b>	
<b>Email:</b>	Catherine.Rousch@synergy.net.au
<b>Organisation:</b>	Synergy
<b>Address:</b>	228 Adelaide Terrace Perth 6000
<b>Date submitted:</b>	27 May 2010

---

#### Submission

---

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

Synergy supports Rule Change Proposal RC\_2010\_08, which seeks to remove the imposition of the Downward Deviation Administrative Price (DDAP) when a Facility is either ramping up or down in accordance with its Resource Plan and output is less than the Facility's minimum registered stable generation, or when a Facility is experiencing a complete Forced Outage.

Synergy agrees with Griffin Energy that the current application of DDAP is unwarranted, given that, when output is less than minimum generation during ramp up/ramp down, Facility limitations are beyond the control of the Market Generator. Synergy also agrees that applying DDAP during Forced Outages imposes an additional cost on the Market Generator that are unmerited given that capacity refunds act as an incentive to maintain available capacity.

Synergy agrees with the amendments proposed by Griffin Energy.

---

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

Synergy agrees with Griffin Energy that the proposed changes will enable the Market Rules to better address Market Objectives (a), (c) and (d).

---

**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.

---