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

**RC_2010_37 Calculation of the Capacity Value of Intermittent
Generation – Methodology 2 (Griffin Energy)**

Submitted by

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Date submitted:	03/02/2011

Submission

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

Collgar supports the Rule Change Proposal RC_2010_37.

Collgar believes the Proposal 2A developed by the external expert McLennan Magasanik Associates (**MMA**) engaged to investigate this issue as part of Work Package 2 of the Renewable Energy Generation Working Group is the most technically sound option to value the contribution of intermittent generators during periods of peak demand. Collgar also notes that Proposal 2A was the recommended proposal of MMA. However, taking into account the Market Objectives, Collgar acknowledges that Proposal 2B is a preferred option.

In comparison to Rule Change Proposal RC_2010_25, Collgar believes RC_2010_37 better achieves the Market Objectives and is most consistent with the current framework.

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

Collgar believes that the Rule Change Proposal will operate to better facilitate the achievement of Market Objectives, in particular Market Objective (c).

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.

NA

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

NA