Wholesale Electricity Market – Rule Change Proposal Submission Form

RC_2009_09 Exemption from real-time compliance for certain commissioning units

Submitted by

Name:	Graeme Alford
Phone:	9475 0144
Fax:	9475 0173
Email:	graeme.alford@landfillgas.com.au
Organisation:	Landfill Gas & Power Pty Ltd
Address:	PO Box 861 CLOVERDALE WA 6985
Date submitted:	10 March 2009

Submission

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

LGP supports the Rule Change proposal on the grounds that an efficient and effective market should permit commissioning generators reasonable operational flexibility and System Management should not be required to real-time monitor their activities when they are not impacting system security. We perceive the Rule Change to properly preserve System Management's obligations and powers to manage the system whilst facilitating the needed flexibility.

LGP supports the Fast Tracking of this Rule Change to accommodate the needs of a new entrant generator.

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

LGP supports System Management's contention that the proposal supports market objective (a) (to promote the economically efficient, safe and reliable production and supply of Electricity) by allowing a new Facility to complete commissioning without having to comply with potentially burdensome requirements that are both an impediment for the generator and an unnecessary distraction for System Management.

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

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.