



RC 2012 10: Limits to early entry capacity payments

Griffin would like to provide brief comment on proposed rule change RC_2012_10:

Summary:

Synergy proposes to remove the ability for DSM capacity (though more generically perhaps Synergy means all non-generation capacity?) to receive ‘early’ capacity payments (as early as 1st June, rather than the start of the new capacity year of 1st October)

IMO contends that the possibility to bring capacity accreditation and payment was introduced during a period of “capacity shortage” and that basically – as there is no shortage now, the rule provision allowing for early accreditation should now be removed.

In this way the flexibility the rule provides is preserved for a future time when the SWIS may experience a tightening of reserve margins (an additional incentive to bring capacity online sooner when needed) and provide no additional incentive when capacity on the SWIS is above a determined comfort zone.

Sincerely,

Andrew Stevens
Manager – Energy Trading