
Wholesale Electricity Market – Rule Change Proposal Submission Form

RC_2007_05 Reserve Capacity Refund Shortfall Formula

Submitted by

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Submission

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

We note that the proposed rule change is intended to correct an error that arose as a consequence of a prior rule change intended to ensure that the fulfilment of the Reserve Capacity obligation of a Market Generator which is also a Market Customer was properly determined. The original form of this change caused an unintended detrimental impact on Intermittent Generators that do not file valid STEM submissions via understating their capacity contributed and thereby miscalculating a refund to be due.

On this basis, we support this Rule Change.

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

We support the IMO's assessment of the change better facilitating the achievement of the Market Objectives and in particular emphasise that the importance of avoiding discrimination against

