

retained as a ten year arrangement to accommodate the establishment of major generation solutions which significantly delay, or maybe even circumvent, major capital outlay on network augmentation. This would not be the optimum solution however.

In conclusion, Verve Energy supports the need for Western Power to have greater flexibility when

procuring network control (aka dispatch support) and , while it has no objection to the proposed rule change, believes that there is, as discussed above, a more efficient way of achieving the desired outcome.

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

Verve Energy, notwithstanding the discussion above re the inefficiency in general of Network Control Services agreements, agrees with Western Power that the proposed rule change supports Market Objectives (a) and (d) ie:

(a) “ ...promote the economically efficientsupply of electricity...” , and

(d) “ ...to minimise the long-term cost of electricity”

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.
