

### Wholesale Electricity Market Rule Change Proposal Submission Form

## RC\_2008\_31 Capacity Credits for Solar Facilities

#### Submitted by

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|-----------------|------------------------------------|
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#### Submission

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

Under the existing Market Rule 4.11.3A, a Market Participant may elect to have the certified



Further, whether or not RC\_2008\_31 would result in capacity certification for solar facilities being set at levels that more closely approximated the capacity that would be available from those facilities during periods of peak system demand has not been empirically examined.

Consequently, Alinta considers RC\_2008\_31 should not be approved as currently proposed. Instead:

- RC\_2008\_31 should be amended to apply only to intermittent solar facilities; and
- The IMO should undertake a technical study to assist it and Market Participants in assessing whether the amendments proposed by RC\_2008\_31 for the calculation of certified reserve capacity for solar facilities is consistent with the Market Objectives and should therefore be approved.

2. Please provide an assessment whether the change will better facilitate the