



### **Rule Change Proposal**

RC\_2009\_10 would establish a new concept of Early Certified Reserve Capacity (ECRC), which would essentially assign Capacity Credits to a (committed) Facility outside of the current Reserve Capacity Cycle, and would not require a subsequent application to the IMO for Certified Reserve Capacity as part of a future Reserve Capacity Cycle.

### **Alinta's views**

Alinta does not support RC\_2009\_10. The Rule Chang



- potential

While RC\_2009\_10 may not be inconsistent with Market Objectives (b) and (e):

- it is unlikely to facilitate efficient entry of new competitors [Market Objective (b)] given arranging project finance is a necessary *precursor* to a FID and the proposed ECRC mechanism would not provide any greater certainty as to the assignment of Capacity Credits to the new Facility; and
- it is unlikely to affect the taking of measures to manage the amount of electricity used and when it is used.

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**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.**

The changes to the Market Rules contemplated by RC\_2009\_10 would not require Alinta to change its IT or business systems, and hence there are no IT or business costs associated with the rule change proposal.

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**4. Please indicate the time 3117( )-2.1a45.155.q0026(i)7.84la**