
Wholesale Electricity Market
Rule Change Proposal Submission Form

RC_2010_06 Application of Spinning Reserve to Aggregated Facilities

Submitted by

Name:	Catherine Rousch
Phone:	6212 1125
Fax:	
Email:	Catherine.Rousch@synergy.net.au
Organisation:	Synergy
Address:	228 Adelaide Terrace Perth 6000
Date submitted:	24 August 2010

Submission

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

Synergy supports Rule Change Proposal RC_2010_06 and the additional amendments to the Market Rules proposed by the IMO in the Draft Rule Change Report which will act to remove the current bias whereby aggregated Facilities may incur a greater proportion of Spinning Reverse services payment costs under Appendix 2 than they would if they were treated as non aggregated Facilities.

Synergy suggests one minor amendment to the proposed amendments to Appendix 2, dot point three (~~deleted text~~, added text):

- x If facility f is a Scheduled Generator that is the sum of more than one aggregated ~~Facilities~~ Facility, each with an interval meter and each injecting energy at an individual connection

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

Synergy believes that the proposed changes will better facilitate the achievement of Market Objectives (a), (b) and (d):

(a) *to promote the economically efficient, safe and reliable production and supply of electricity and electricity related services in the South West interconnected system;*

(c) *to avoid discrimination in that market against particular energy options and technologies, including sustainable energy options and technologies such as those that make use of renewable resources or that reduce overall greenhouse gas emissions;*

(d)