
**Wholesale Electricity Market
Rule Change Proposal Submission Form**

RC_2010_11 Removal of Network Control Services expression of interest and tender process from the Market Rules

Submitted by

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Submission

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

Synergy supports Rule Change Proposal RC_2010_11 which acts to:

- (i) Remove the Network Control Service (**NCS**) expression of interest, tender and contracting processes from the Market Rules. Instead, these processes will be undertaken in accordance with the Electricity Networks Access Code (**Access Code**); and
- (ii) Amend the Market Rules so that the energy price paid by the market to NCS providers is the Marginal Cost Administered Price (**MCAP**) for NCS provided through generation and zero for NCS provided through Demand Side Management (**DSM**).

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

Synergy agrees with the IMO that the proposed amendments allow a Network Operator to more effectively manage its risk in contracting for NCS and remove the potential for energy payment cross subsidy from Market Participants to users benefitting from an NCS. Synergy believes that the proposed changes will better facilitate the achievement of Market Objectives (a) and (d):

(a)