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

**RC_2010_29 Curtailable Loads and Demand Side Programmes –
Second Submission Period**

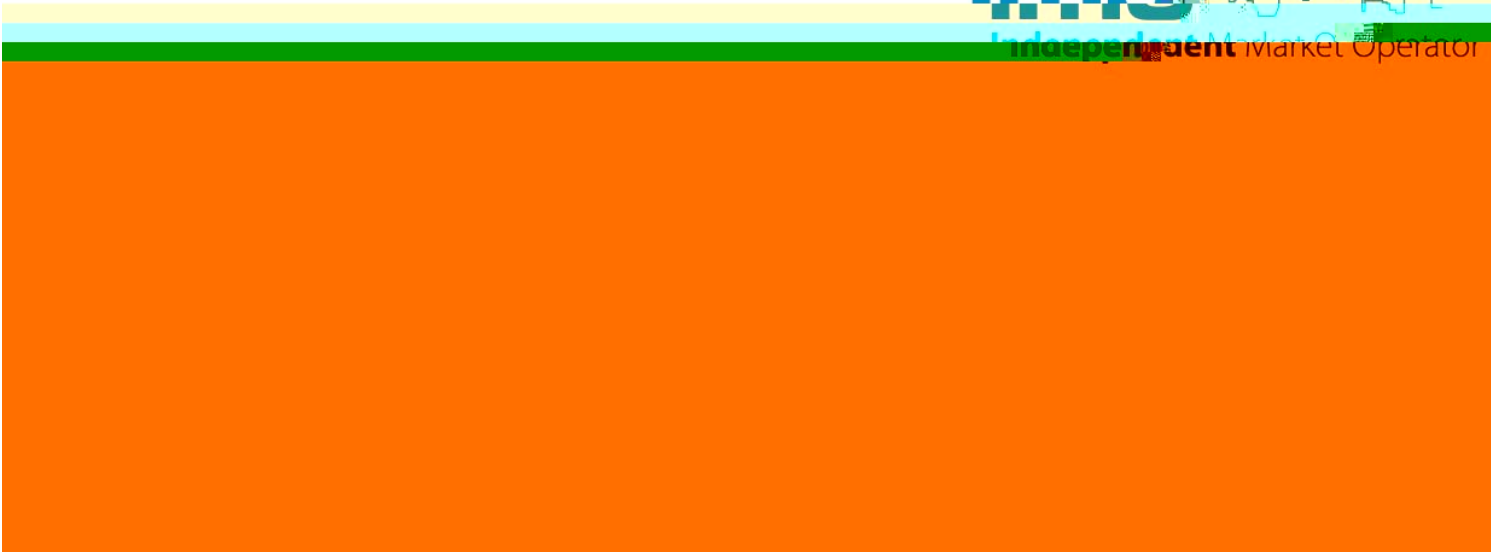
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Submission

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

Rule Change Proposal RC_2010_29 acts to amend the Market Rules to, among other things, ensure better consistency between the treatment of Curtailable Loads (**CLs**) and other capacity types.



In summary, Synergy sees merit in proceeding with RC_2010_29 as set out in the draft report as it will implement changes that have been refined and improved as a result of a number of reviews by MAC. Synergy does acknowledge that an alternate methodology (dynamic baseline) to assess DSP performance has recently been discussed, but is of the view that significant development work is required before it can be further considered by the market. Synergy notes, as has been the case with the development of this rule change, that the market may require a new methodology, such as the dynamic baseline, undergo an extended iterative process prior to final consideration. Given this, Synergy considers that the market should not give up an opportunity to implement the well considered