Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2010_29 Curtailable Loads and Demand Side Programmes

Submitted by

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Submission

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

Draft Rule Change Report: Curtailable Loads and Demand Side Programmes

Ref: RC_2010_29

Standard Rule Change Process

Dated 18 March 2011

System Management submits the following three issues.

1 Market Participant Registration

"The IMO notes that amending the Market Rules to create a DSP Provider as a new class of Rule Participant would be a much more complex option to implement than the IMO's proposal to simply define a DSP as a type of Facility. If a DSP Providerewe be registered as a distinct type of Rule Participant, the IMO would still need to define awrfacility type to allow for Standing Data to be provided and Dispatch Instructions to be issued etc. The IMO notes that DSPs are registered as a Rule Participant in the Market Customer class.

The IMO considers that the proposed solution registering a DSP as a type of Facility

System Management is unclear how there can be a separation between having 3 blocks in reserve capacity but no blocks in dispatch. Presumably for reserve capacity purposes each block can have a different characteristic such as the number of times it can be interrupted.

Assuming this to be the case and given that it the IMO is required to provide System Management

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