
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.

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

Synergy supports implementation of:

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the Market Rules are not required to effect this issue). Synergy notes its support for RC_2010_12, which acts to amend the Market Rules so that a DSP is considered as a single Facility for the purposes of evaluating a request for the return of Reserve Capacity Security; and

- **Issue 7: Stipulated Default Loads**, which incorporates the concept of a Stipulated Default Load into the DSP. This will ensure that Capacity Credits accurately reflect the true curtailability of a DSP.

- For **Issue 5: Capacity Cost Refunds** - to better address Market Objective (a) by requiring a DSP which fails to meet its capacity obligations to pay refunds. This will provide incentive for DSPs to be fully available at all times, particularly during system peak times, thereby promoting the efficient, safe and reliable production of electricity supply; and
- For **Issue 7: Stipulated Default Loads** - to better address Market Objective (a) by ensuring that the Capacity Credits assigned to a Facility will more accurately reflect the true availability of a DSP, thereby promoting economic efficiency.

Synergy does not believe that **Issue 8: Potential Double Payment**, where CLs continue to receive a