Wholesale Electr icity Market

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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_31, which acts to amend the Market Rules to enable the IMO to de-register a Rule Participant if it is clear that the Rule Participant no longer meets the requirements of clause 2.28.19 of the Market Rules. Currently, the Electricity Review Board (Board), in accordance with the Electricity Industry (Wholesale Electricity Market) Regulations 2004 (Regulations), can order a Rule Participant's registration be cancelled.

The rule change will enable a Rule Participant to appeal the IMO's decision to de-register it to the Board. Synergy makes the comment that Rule Change Proposal RC_2010_31 should not commence until after the Regulations have been appropriately changed or a Rule Participant will be unable to appeal a decision by the IMO to cancel its registration.

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

Synergy agrees with the IMO that the Rule Change Proposal will allow the Market Rules to better address Market Objective (a):

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

3.   Please indicate if the proposed change will have any implications for your
     organisation (for example changes to your IT or business systems) and
     any costs involved in implementing these changes.

Synergy would not require any changes to IT or business systems, nor incur any organisational costs
as a consequence of adopting the proposed change.

4.   Please indicate the time required for your organisation to implement the
     change, should it be accepted as proposed.

Synergy would be able to implement this rule change immediately.