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## Wholesale Electricity Market Rule Change Proposal Submission Form

RC\_2010\_25 Calculation of the Capacity value of Intermittent  
Generation – Methodology 1 (IMO)

RC\_2010\_37 Calculation of the Capacity value of Intermittent  
Generation – Methodology 2 (G riffin)

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Submitted by

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Date submitted:	30/ 11 / 2011

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Submission

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

Mid West Energy Pty Ltd (MWE) supports the IMO's decision to request further submissions given the importance of the issues.

In its earlier submission, MWE was prepared to support the 'amended' RC\_2011\_25 as proposed by the IMO Board, subject to:

1. The peak 12 intervals per year being selected based on times of peak demand, rather than LSG; and
2. The 'U' factor being removed from the calculation.

MWE considers the IMO's proposed solutions to be flawed as they add further complexity to concepts that have already been discredited. MWE is disappointed that the IMO has chosen to introduce a new 'fleet' concept at this late stage of the process. As such, MWE's position is to reiterate its opposition to the U Factor and LSG concepts in their entirety.

