
**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 (Griffin Energy)**

Submitted by

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- € The rule change should consider with greater weight the outcome of the research undertaken by MMA which showed a strong correlation between performance of Western Australian wind farms and demand during summer peak intervals

Wind Prospect understands the importance of security of supply on the SWIS, but does not believe this should be achieved by changing the investment incentives through the Reserve Capacity system. A change of the current methodology will have a disproportionate impact on investment in wind energy in Western Australia.

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

The current proposed RC_2010_25, if implemented, will provide an unfair disincentive for investment in renewable energy projects in Western Australia and should be withdrawn. Wind Prospect believes RC_2010_25 is not consistent with the overall market objectives of avoiding discrimination.

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.

No comment.

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

No comment.
