
Wholesale Electricity Market Rule Change Proposal Submission Form

RC_2011_05 Curtailable Load Dispatch Clarification

Submitted by

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Organisation:	Date submitted:
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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_2011_05, which acts to ensure that System Management makes the most efficient dispatch by ensuring Curtailable Loads and Dispatchable Loads are dispatched as liquid facilities. Currently, System Management may dispatch Curtailable Loads and Dispatchable Loads that have bid at the Alternative Maximum STEM Price ahead of Verve and IPP liquid facilities, thereby dispatching a higher cost bid before a lower cost bid.

The current arrangements are also complicated by clause 7.7.4(c) of the Market Rules which requires System Management to exercise discretion in dispatching a Curtailable Load where such dispatch would prevent that Curtailable Load from being available at a later time of greater benefit in regard to System Security and Power System Reliability. While this obligation would remain, given the scarcity of the resource which effectively constrains its frequency of dispatch, it is therefore sensible and pragmatic to categorise Curtailable Loads as a liquid facility. This would result in a more efficient dispatch process as the requirement for System Management to exercise discretion would be reduced.

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.*

by ensuring dispatch of a lower cost bid before a higher cost bid and thereby promoting an economically efficient market.

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.
