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Date submitted:	17 October 2011

Submission

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

Synergy supports System Management’s assessment that an inconsistency or mismatch arises between clause 4.5.12(c) in its calculation of capacity quantities required for Availability Classes 2, 3 and 4 and the availability hours listed in Appendix 3 for those Availability Classes. Specifically, Synergy agrees that as a result of determining the capacity requirement of Availability Classes 2, 3 and 4, as currently defined by clause 4.5.12(c), may result in load for a segment being short of that expected as a consequence of the application of Appendix 3. For instance, in respect of Availability Class 4, clause 4.5.12(c) determines the required capacity based on minimum availability of 48 hours which may result in the load for a segment of the Availability Curve not being fully covered on account of the Appendix 3 setting a minimum of 24 hours. Clearly this misalignment of definitions of minimum availabilities can give rise to risk that the load duration curve is not fully covered.

Synergy agrees that amendments proposed in the Draft Rule Change Report to both 4.5.12(c) and Appendix 3 in regard to the hours of availability for each Availability Class remove the misalignment and also clarify that there is no overlap in the hours of availability of each Availability Class, as is currently the case. Synergy also agrees that it is redundant to list the hours of availability for Availability Class 1 in Appendix 3 given it is not stated in clause 4.5.12(c) and that therefore reference to it can be removed in Appendix 3 from the table defining the hours of availability for each Availability Class. Synergy also supports the IMO’s proposed amendment to the Appendix 3 preamble to clarify and reinforce that Availability Class 1, being generation facilities, has the highest availability requirement.

A further amendment to Appendix 3 to remove a possible ambiguity

