range band in the current structure. This capacity would also be able to contribute to the evening ramping problem that is being created by the penetration of rooftop PV.

We note that there might also be equivalent benefits arising from the Newgen-Kwinana baseload facility.

We support the Submitter's proposal that the Rule Change should be processed with High urgency.

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

We support the Submitter's contentions as stated in the Rule Change Notice.

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.

We agree with the Submitter's contention that the costs to Market Customers will be reduced.

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

Not applicable