

Wholesale Electricity Market Rule Change Proposal Submission

RC_2019_03

Method used for the assignment of Certified Reserve Capacity to Intermittent Generators

Submitted by

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Submissions on Rule Change Proposals can be sent by:

Email to: support@rcpwa.com.au

Post to: Rule Change Panel
Attn: Executive Officer
C/o Economic Regulation Authority
PO Box 8469
PERTH BC WA 6849

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

Alinta Energy appreciates the opportunity to provide feedback on the proposed reforms to the method for assigning Certified Reserve Capacity to intermittent generators.

Overall, Alinta Energy strongly supports the proposed RLM, considering that it will correct significant errors in the current rules, including how the existing method:

- incorrectly identifies intervals with the lowest capacity surplus;
- values capacity on an individual facility basis, which can overvalue existing facilities and undervalue new facilities; and
- uses ill-defined parameters, making it difficult for asset owners and investors to understand the factors that will influence their capacity revenue.

Alinta Energy considers that it is crucial to correct these errors because wind farms are

A linta Energy's views on questions raised by AEMO and RCP Support

Concern that RLM would not reflect available capacity during POE10 intervals

According to the rule change proposal, AEMO and RCP Support raised concerns that

5. The proposal to determine the _____ as the median of the

