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29 October 2007

Dear Dora

WEM Rule Change Proposal RC 2007 10 – Intermittent Generator Resource Plan Exemption

Thank you for the opportunity to provide comments on Rule Change Proposal RC 2007 10 – “Intermittent Generator Resource Plan Exemption”. This letter sets out the view of Alinta Sales Pty Ltd (Alinta).

The proposed change

On the 13th of September 2007 Synergy submitted RC 2007 10 to the Independent Market Operator (IMO). Synergy proposed to change the market rules to allow intermittent generators discretion in whether they submit a resource plan. Synergy also proposed to remove the calculation of the resource plan deviation quantity (RPDQ) from the balancing settlement calculations.

Alinta's view

Alinta agrees with Synergy's proposal to remove the obligation on intermittent generators to submit and follow a resource plan. Alinta does not understand why the proposal has been limited to generators that only have intermittent generators in their portfolio. To avoid discrimination in the treatment of intermittent generators the change should apply to all intermittent generators regardless of the composition of the portfolio they may reside in.

Alinta would welcome further detail, underpinned by some analysis, before commenting on the impact of removing the RPDQ calculation from the market rules.

Alinta considers there may be a detrimental impact on (b) and (d)¹ of the Market Rules if the proposal is not amended to apply to all intermittent generators. Alinta is not in a position to give an

¹ The objectives of the Market Rules are contained in Market Rule 1.2.1 and are:

(a) “to promote the economically efficient, safe and reliable production and supply of electricity and electricity related services in the South West Interconnected System”

(b) “to encourage competition among generators and retailers in the South West Interconnected System, including by facilitating efficient entry of new competitors”

(c) “to avoid discrimination in that market against particular energy options and technologies, including sustainable energy options and technologies such as those that make use of renewable resources or that reduce overall greenhouse gas emissions”

(d) “to minimise the long-term cost of electricity supplied to customers from the South West interconnected system”

overall assessment of the proposal against all of the Market Objectives until further detail and analysis of the impact of removing the RPDQ calculation from the rules is available.

IT systems and cost implications

There will be a cost impact on Alinta's system. The impact is likely to be insignificant.

Time required for implementation

Alinta has not identified a need for any significant lead time to implement the proposed change.

Please call me on 08 6213 7304 to discuss any of the issues raised in this letter in more detail.

Yours sincerely



Kristian Myhre
Manager Market Analytics
Alinta Sales Pty Ltd

(e) "to encourage the taking of measures to manage the amount of electricity used and when it is used"