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## Wholesale Electricity Market Rule Change Proposal Submission Form

### RC\_2009\_08 – Update to Commissioning Provisions

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#### Submitted by

<b>Name:</b>	Shane Cremin
<b>Phone:</b>	9261 2908
<b>Fax:</b>	9488 7330
<b>Email:</b>	<a href="mailto:shane.cremin@thegriffingroup.com.au">shane.cremin@thegriffingroup.com.au</a>
<b>Organisation:</b>	Griffin Energy
<b>Address:</b>	L 15, 28 The Esplanade, Perth, WA, 6000
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#### Submission

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

Griffin made a submission on this proposal in the first submission period. Further to the clarification offered by the IMO at the workshop<sup>1</sup> addressing the issue raised in Griffin's original submission, Griffin is of the opinion that the *intent* of the rule change is generally consistent with the Market Rules. However, we believe that the wording of clause 4.26.1A(a)v, as set out in the draft rule change report, does not represent the desired outcome, as explained at the IMO workshop. Specifically, clause 4.26.1A(a)v suggests that while any portion of an approved Commissioning Test remains outstanding, then the participant will incur Facility Forced Outage Refunds on the full capacity of the facility. At issue is the ambiguous delineation as to whether a facility is still undergoing a Commissioning Test; and the opportunity for a participant to nominate that it is no longer "commissioning" and is subject to the submission of and adherence to a Resource Plan.

From subsequent discussions with the IMO, Griffin expects clause 4.26.1A(a)v to be altered to reflect the stated intent of the rule change proposal.

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<sup>1</sup> Note: at the time of submission, no minutes or record of the workshop were available to reference.