

APPENDIX C – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	Federation of Energy Response Aggregators (FERA)
Type of Stakeholder	<i>DSU / AGU</i>
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Confidential Response	No

CAPACITY MARKET CODE MODIFICATIONS WORKSHOP 40 CONSULTATION COMMENTS:

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ID	Proposed Modification and its Consistency with the Code Objectives	Impacts Not Identified in the Modification Proposal Form	Detailed CMC Drafting Proposed to Deliver the Modification
CMC_12_24: Proportion of Delivered Capacity in respect of incremental New Capacity	<p>(i) It facilitates the Efficient Discharge of TSO Obligations</p> <ul style="list-style-type: none"> - by ensuring that physically delivered and commissioned capacity is correctly recognised and thereby preventing scenarios where new capacity fails to meet substantial completion in a latter auction for the same Capacity Year. - helping maintain market integrity and accurately reflecting available capacity. <p>(ii) It ensures Economic and Coordinated Operation of the Capacity Market</p> <ul style="list-style-type: none"> - by applying consistent de-rating factors at different capacity market stages, the modification eliminates the risk of financial losses due to administrative inconsistencies & reduces risk of capacity shortfall. - encouraging investors to participate in capacity expansion without fear of termination penalties. 	<p>No significant negative impacts have been identified.</p> <p>SSE did raise the fact that <u>additional working examples</u> would be useful to see. Also <u>clarification around the variance in de-rating factors within Auctions</u> for the same Capacity Year would be beneficial.</p> <p>FERA would support both of these suggestions and ask the RAs/TSOs to present greater transparency on how de-rating factors are determined within a Capacity Year.</p> <p>The RAs/TSO could identify the risk of 'increasing derating factors' occurring, since this has not been witnessed to date.</p>	<p>FERA supports the modification.</p> <p>The proposed amendments to G.3.1.4 and the introduction of G.3.1.4B provide a clear and effective solution to the issue identified.</p> <p>We believe this approach ensures consistency between Qualification/Award and Substantial Completion phases.</p>

NB please add extra rows as needed.