

APPENDIX C – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	<i>iPower Flexible Energy</i>
Type of Stakeholder	<i>AGU / DSU</i>
Contact name (for any queries)	<i>C. McGurran</i>
Contact Email Address	clare@ipowerflex.energy
Contact Telephone Number	<i>028 9600 2900</i>
Confidential Response	No

CAPACITY MARKET CODE MODIFICATIONS WORKSHOP 42 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
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<p>CMC_01_25: Provision of Information Related to Application Rejection under E.7</p>	<p>The proposed change deals with the lack of clarity when an application is rejected under section E.7. Currently, not enough detail is given, which makes it hard for participants to respond effectively. The change would make sure participants receive clear reasons for rejection, including input from any third-party reviews. This would help them reply more accurately and make the process fairer.</p> <p>A.1.2.1 (a) – Giving clear reasons early on will cut down on back-and-forth and make the review process smoother.</p> <p>A.1.2.1 (e) – This proposal is an important move toward more transparency.</p> <p>A.1.2.1 (g) – Making sure that capable capacity providers aren't left out because the process lacks clarity helps keep the electricity supply more secure and leads to better value for consumers in the long run.</p> <p>In summary, iPower fully support the proposed change. It improves the current process by giving participants clear and timely information, which strengthens transparency, and fairness, in the Capacity Market.</p>	<p>While the proposal states that the extra work involved is minimal, iPower believe that how the review process works, and SO internal improvements, will need a bit more attention. iPower propose that these aren't blockers, just things that should be managed with small process changes.</p> <p>iPower still fully support the proposed change and believe its benefits clearly outweigh these additional potential minor operational burdens.</p> <p>The provision of the additional information should be either in line with the decision announcements or within a specified time due to the short time periods by which participants are expected to respond.</p>	<p>Overall, we are supportive of the drafting as it effectively captures the intent and operational outcomes of the proposed modification.</p> <p>The wording requires SOs to tell participants which E.7 requirements were not met, ensures all reasons for rejection are explained, improving on the current unclear process, and requires sharing third-party reports if they influenced the decision.</p> <p>A slight change to the wording may perhaps reduce any ambiguity: iPower propose changing the wording 'and all of the reasons why' to the following: "...they shall notify the Participant of the requirements under section E.7 that the Application for Qualification failed to satisfy and provide a complete explanation of the grounds for the rejection proposed."</p> <p>It is also proposed that the timeframe for the provision of such information, should be included.</p>
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<p>CMC_02_25: Separate De-Rating Factor for New Vs. Existing Capacity</p>	<p>iPower acknowledges the intention behind this proposal to improve fairness and accuracy in de-rating factor calculations, particularly for new generation units. While the "Age of Unit" concept may be more directly applicable to thermal and storage technologies, we do agree with an overarching concern that current de-rating factors are not effectively reflecting the real performance or reliability of many units, especially Demand Side Units (DSUs).</p> <p>iPower's perceives a broader issue of persistent negative market signals toward DSUs and other flexible technologies. These signals are exacerbated by a lack of transparency around how de-rating factors are calculated and applied. We see this proposal as a step in the right direction but stress the need for a more comprehensive review of de-rating methodologies across all technologies, including demand side participation.</p>	<p>Whilst this proposal mainly looks at conventional generation, it should be highlighted that De-rating factors are on a steep downward trend. This puts demand side flexibility at a disadvantage and can discourage future investment or innovation.</p> <p>iPower propose that there should be regular, focused working groups between the TSOs and each technology type which would create clear channels for ongoing feedback.</p> <p>Right now, it's unclear how de-rating factors are worked out, and without this insight, it's hard to respond, improve, or challenge decisions.</p>	<p>We recommend that, before making any decision on this proposed modification, the TSOs publish clear explanations of how de-rating factors are calculated and seek feedback from each technology group—particularly where the assumed performance may not reflect actual results.</p> <p>There are still open questions from the recent workshop, including how the changes would apply to refurbished technologies. Additional clarity is also needed for aggregators with large, mixed portfolios that include both aggregated generation and demand reduction, especially around how "new" and "existing" technologies will be defined.</p>

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CMC_03_25: Clarification of Proportion of Delivered Capacity for multiple tranches	<p>iPower supports this modification as a clear and helpful update that clarifies the current rules for calculating Proportion of Delivered Capacity across multiple tranches which aren't clear enough. This change ensures that PDC is calculated in a consistent and logical way, based on how the capacity was originally awarded. It gives participants more certainty about how their delivery will be assessed and builds trust in the process.</p> <p>The proposal helps meet key Capacity Market Code objectives: A.1.2.1 (a): It helps TSOs do their job more effectively by clearly defining how to calculate PDC. A.1.2.1 (e): It improves transparency by giving participants a clearer view of the delivery rules. A.1.2.1 (f): It ensures all participants are treated fairly, when delivery happens in stages.</p>	<p>There is a concern that the DRF for awarded capacity from different tranches is still applied within a different tranche.</p> <p>It's proposed to use non-derated/installed MWs instead of derated MWs for assessments.</p> <p>This would simplify the process significantly, making the assessment method less complex.</p>	<p>The legal drafting in this proposal is clear.</p> <p>It removes outdated or repeated sections (like G.3.1.3 and G.3.1.5), updates the PDC formula so it works for multiple contract entries, and sets a clear order for applying the rules based on auction date and bid price.</p> <p>We support the changes to Section G.3.1.4 and how the definitions have been reorganised to make the rules easier to follow. The drafting meets the goals of being consistent and easy to understand.</p>

NB please add extra rows as needed.