APPENDIX C – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	Federation of Energy Response Aggregators
Type of Stakeholder	
Contact name (for any queries)	*Brian Mongan*
Contact Email Address	*b.mongan@fera.energy*
Contact Telephone Number	
Confidential Response	~~[Y]~~ / [N]

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
CMC_01_25: Provision of Information Related to Application Rejection under E.7	This modification 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 understand the reasons for rejection and 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. The Code objectives support this approach Efficiency under A.1.2.1 (a) – Giving clear reasons early on will cut down on back-and-forth. Transparency under A.1.2.1 (e) – More information with justification. Promotion of consumer interests under 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. FERA fully supports the proposed change. It improves the current process by giving participants clear and timely information, which strengthens transparency, and fairness, in the Capacity Market.	The proposal states that the extra work involved is minimal. FERA believes that the SO should already have this information readily to hand when making its decisions. There may be a need for some small process changes. The provision of the additional information should be either in line with the decision announcements or within a specified time. The current proposal would require the SO to publish at the same time. There currently is a tight timeline between "System Operators notification of outcome Date" and "Qualification Dispute Notice Date" and therefore the information must be provided quickly.	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. FERA accepts the wording. We would suggest "…analysis produced by such parties and considered by the System Operators shall be made available to the Participant **within one working day**.

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CMC_02_25: Separate De-Rating Factor for New Vs. Existing Capacity	FERA 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). FERA would stress the need for a more comprehensive review of de-rating methodologies across all technologies, including demand side participation. We welcome the SEMC comment to consult on methodology changes alongside the parameters consultation for T-4 2029/30 auction	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. Workshops to discuss the implementation of methodology should be held in order to assist participants to appreciate the DRFs Within Demand Side Units there can be New and Existing capacity, but these do not reflect the age of the service behind that.	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.

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<tr><th>ID</th><th>Proposed Modification and its Consistency with the Code Objectives</th><th>Impacts Not Identified in the Modification Proposal Form</th><th>Detailed CMC Drafting Proposed to Deliver the Modification</th></tr>
<tr><td>CMC_03_25: Clarification of Proportion of Delivered Capacity for multiple tranches</td><td>FERA supports this modification as a clear and helpful update that clarifies the current rules for calculating Proportion of Delivered Capacity across multiple tranches.</td><td>This change continues to utilise an analysis based on Derated values. It groups together derated values from previous tranches, that have a different DRF applicable to them. These are in the Denominator of the equation
The Numerator values in the equation however utilise a DRF from the current tranche.
This could be viewed as inconsistent application of associated DRF for awarded volume for different tranches.</td><td>The legal drafting in this proposal is clear.</td></tr>
<tr><td>Calculation with Installed MW is substantially complete with 120MW, which the SO examples show as a Fail.</td><td colspan="3">
<table>
<tr><th></th><th>Awarded MW</th><th>Derating factor</th><th>Expected installed MW</th><th>Actual installed
Cumulative Sum</th><th>120 MW
Delivered %</th></tr>
<tr><td>Tranche 1</td><td>80</td><td>0.8</td><td>100.000</td><td>100</td><td></td></tr>
<tr><td>Tranche 2</td><td>7</td><td>0.7</td><td>10.000</td><td>110</td><td>109%</td></tr>
<tr><td>Tranche 3</td><td>5</td><td>0.6</td><td>8.333</td><td>118.33</td><td>101%</td></tr>
<tr><td>Tranche 4</td><td>10</td><td>0.7</td><td>14.286</td><td>132.62</td><td>90.48%</td></tr>
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</td></tr>
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NB please add extra rows as needed.