APPENDIX C – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	Federation of Energy Response Aggregators (FERA)
Type of Stakeholder	*Demand Side Response*
Contact name (for any queries)	*Brian Mongan*
Contact Email Address	*b.mongan@fera.energy*
Contact Telephone Number	*07889087390*
Confidential Response	No

CAPACITY MARKET CODE MODIFICATIONS WORKSHOP 43 CONSULTATION COMMENTS:

APPENDIX C – RESPONSE TEMPLATE

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_04_25: Adjustment of CMC auction qualification criteria to facilitate complex projects within State Aid approval	FERA does agree that the current timeframes do not facilitate all the potential projects. The eight T-4 auctions for 2022 onwards have had an average of 3.5 years from contract award to start of the capacity year, which can have a significant impact in delivering a project on time. FERA supports this modification.	The SOs want to tighten entry requirements but that could exclude projects that need more than 4 years to build and deliver? The SOs state they have concerns on the volume calculation for a given capacity year, but they are able to allow multi year developments NOT to deliver in the first year and half of the following year.	No Comment
CMC_05_25: Early Termination of Intermediate Length Contract Capacity	FERA agrees with the RAs that current rules allow for termination and market power abuse could be a concern of this Modification	No further comment	No Comment
CMC_06_25: Amendment of ARHL De-rating factor Definition to Exclude Intermediate Length Contracts.	ILCs are part of Existing plant provision, although they have invested in order to refurbish and continue to provide much needed volume.	Refurbishment of existing plant allows continuance of such plant and thus provision of reliable volume. This extension of existing plant should not be viewed as different from the original position and therefore not apply ARHL to the complete plant.	The proposed drafting maintains clarity while effectively addressing the issue. It ensures ease of implementation for both market participants and the System Operators.

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CMC_07_25 Maintaining Net Present Value in new capacity market contracts for no-fault delays	It is best to remove any financial investors concern regarding return on investment, in order to attract ongoing development	No Comment	No Comment
CMC_08_25 Ensuring robust, transparent and objective qualification criteria in the Capacity Market	The SOs suggest that the modification would deter speculative and potentially spurious applications. FERA would question if that should be SEMO's call during QUALIFICATION? A developer can hold back from actual auction submission, OR it can terminate at cost to itself should it be unable to deliver. These incentives may be a better method to limiting such applications.	The requirement of a Connection offer/agreement for qualification does not align with previous approaches by the CRU, in directing ESB/Eirgrid to offer such when a participant is awarded Capacity. FERA would be concerned as to how DSU technology would be assessed given the multiple Individual Demand Sites and future growth (T-4) would not necessarily be accompanied with the required paperwork.	No Comment
CMC_09_25 Registration and Qualification Auction Timetable Milestones	No Comment	No Comment	No Comment

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NB please add extra rows as needed.