

APPENDIX D – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	Power NI - PPB
Type of Stakeholder	Intermediary
Contact name (for any queries)	Sinead O'Hare
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CAPACITY MARKET CODE MODIFICATIONS CONSULTATION COMMENTS:

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_18 – NIROCS in the CRM	Appears to be consistent	No Comment	No Comment
CMC_02_18 – Permitted Disclosures – Credit Agencies	Appears to be consistent	No Comment	No Comment
CMC_04_18 – Capacity Auction Participation	Appears to be consistent	No Comment	No Comment

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<p>CMC_05_18 – Combining Candidate Units into a Capacity Market Unit</p>	<p>While PPB agrees with the principle behind the proposed change, the proposed scope is too narrow and does not address the full range of scenarios where shared costs exist and hence where the cost allocation would vary depending, for example, on the number and combination of units that are ultimately successful in securing a contract. This could be achieved through mutually exclusive bids or some alternative approach that reflects a fixed overhead for a number of units. The proposed approach would not address the possible permutations and hence we consider that further thought is required to devise an approach that addresses all the issues.</p>	<p>As noted already, while this addresses part of the issue we believe the scope needs to be widened to ensure it facilitates a broader range of shared costs and multiple unit configurations.</p>	<p>The proposed CMC drafting changes risk excluding units who have similar shared costs from combining. In addition, the drafting proposes RA approval but there is no indication of the criteria upon which such RA approval will be assessed and this needs to be an element of the overall arrangements to ensure the process is transparent.</p>
<p>CMC_06_18 – Disaggregation of Performance Securities to Capacity Market Unit</p>	<p>It appears that the CMC drafting is already adequate.</p>	<p>No Comment</p>	<p>On the basis the CMC drafting is already considered robust then we agree with the proposal to reject the proposed modification.</p>

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<p>CMC_07_18 – Information Published Following a Capacity Auction</p>	<p>We consider the publication to be consistent with the code objectives and agree with the revised modification that was updated following the working group meeting, to provide for a short window following notification to participants before more general publication.</p> <p>The suggested 3 Working days between private notification and general publication seems too tight and we consider it would be better to provide a full week (i.e. 5 working days)</p>	<p>No Comment</p>	<p>The drafting is not wholly clear and the proposed changes to Appendix C, Table A seem to be incorrect :</p> <ul style="list-style-type: none"> • Event 10 is the publication of the Final Auction Pack – should the new Event not be after Event 15 and before Event 16 (i.e. 15A)? • The indicative timeframe is stated to be “A – 1.5 weeks” which is 1.5 weeks before the commencement of the Auction which is clearly wrong. • Based on the 3 Working days suggested at the workshop this should therefore be “A + 6 Working Days”. • However based on providing a full week as we suggest, then the Indicative Timeframe should be “A + 8 Working Days”.
<p>CMC_08_18 – Typographical Correction – E.8.2.4</p>	<p>Appears to be consistent</p>	<p>No Comment</p>	<p>No Comment</p>

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CMC_09_18 – Publication of Qualification Results	Appears to be consistent	No Comment	No Comment
CMC_10_18 – Report on Capacity Auction	Appears to be consistent	No Comment	No Comment

Respondent Comments in relation to the CMC Modifications process	
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NB please add extra rows as needed.