

APPENDIX C – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	Energia
Type of Stakeholder	Generator
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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
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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
<p>CMC_07_19 Treatment of Multiyear Contracts in the Event of Simultaneous Capacity Auctions</p>	<p>Energia note that the proposed modification is seeking to deal with potential complications in respect of the proximity of the upcoming T-1 and T-2 Capacity auctions, namely that if a CMU is awarded a multi-year contract in the first auction (T-1) that this same capacity could also be included in the second auction (T-2).</p> <p>However Energia see some potential problems with the modifications proposed to deal with this. These include:</p> <ol style="list-style-type: none"> 1. Any amendments to the Demand Curve (and FAIP) for the T-2 auction will be based on Provisional results from the T-1 auction that remain subject to change; 2. The proposed deadlines in relation to this process appear to be very tight i.e. on the 28th November Provisional Results will be provided to participants, the RAs will need to notify SO of any change to the Demand Curve and a revised FAIP will have to be published; 3. Based on the proposed timelines, if the FAIP for the T-2 auction is revised participants will only become aware of this on the same date submissions for the T-2 auction opens. <p>Accordingly Energia would recommend rescheduling the start of the T-2 auction until after the Final auction results from the T-1 auction have been approved on 30th January 2020.</p>	<p>Energia have noted several impacts that have not been addressed in the modification proposal.</p> <p>In order to best deal with these issues Energia recommend rescheduling the start of the T-2 auction until after the Final auction results from the T-1 auction have been approved on 30th January 2020.</p>	<p>Energia have no comments on the detailed drafting proposed however have a broader concern in relation to the auction timing. As such we recommend the rescheduling of the T-2 auction until after the Final auction results from the T-1 auction have been approved.</p>

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