

SEM-20-071: CRAG DIGITAL LIMITED RESPONSE

SUMMARY INFORMATION

Respondent's Name	Crag Digital Limited
Type of Stakeholder	Demand Side Unit
Contact name (for any queries)	Graeme McWilliams
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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_07_20 Version 2 Change in Technology Class for Awarded New Capacity	<p>Crag Digital Limited welcomes the opportunity to respond on this proposed change to the capacity market code. In principle Crag Digital is in support of this change and recognises the work of the regulators in preparing a version 2 of this modification and feel that this revised version delivers additional benefits over the original.</p> <p>Crag Digital believes that this modification is consistent with the objectives of the CMC and in particular is in furtherance of objectives (b) and (c) as it will allow CMC participants to more efficiently provide capacity through the capacity market through increased flexibility in how this capacity is delivered.</p> <p>It is important to capacity market participants to be able to apply for a change in technology class in order to better manage the risk of contracts awarded, especially in T-4 auctions which have a higher level of uncertainty about project development. Failure to allow for a change in technology class would increase the risk to project developers and adversely effect the ability to efficiently deliver capacity.</p>	No comment.	No comment.

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	<p>Crag Digital notes that the existing de-rating methodology accounts for differing levels of risk/availability of different classes of technology such that 1MW of de-rated capacity is fungible and that as long as the same de-rated capacity is delivered any change which promotes the efficiency of delivery of this de-rated capacity is a positive change.</p> <p>Crag Digital welcomes the changes in this version 2 and in particular is supportive of the changes which allow for technology class to change from Clean to a non-Clean technology noting the regulators point that this is unlikely in practice to have any significant adverse impact but that it will deliver greater flexibility of participants to deliver capacity. Other elements such as the updates to the capacity register are prudent inclusions.</p> <p>Crag Digital are in support of the regulators minded to position to approve this version 2 of CMC_07_20.</p>		
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