

APPENDIX C – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	Federation of Energy Response Aggregators (FERA)
Type of Stakeholder	<i>Technology Body</i>
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Confidential Response	No

CAPACITY MARKET CODE MODIFICATIONS CONSULTATION COMMENTS:

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ID	Proposed Legal Text and its Consistency with the Code Objectives	Impacts Not Identified in the proposed Legal Text	Detailed CMC Drafting Proposed to Deliver the Modification
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<p>CMC_03_23: Amendment to Long Stop Date for T-1 Capacity Auction (Legal Text)</p>		<p>FERA members welcome this supplementary consultation and broadly support the modification proposal. Our comments use the relevant consultation clause numbers where possible.</p> <p>Whilst we would not initially support the change of the 1-month Long Stop Date (LSD), our members have experienced delays in getting Eirgrid/SONI work done in time. We look at this as delays by a third party, outside the control of the participant.</p> <p>We therefore support this new version of the mod proposal, with the following comments.</p> <p>Clause 2.2.7. Given the fact that the 2023/2024 T-1 is being run at a later time than would be usual, then there is an increased risk around delivery and thus some participants may be put off in participating. It is therefore suitable that the RAs look favourably in allowing more time for projects to deliver.</p> <p>Clause 2.2.9. The RAs have identified that the proposed timings would mean the 3 month period would end on the 31st December and not much would happen during the Christmas or New Year period. We would also point out that Eirgrid/SONI/SEMO have a registration freeze, usually between 15th Dec to 4th Jan. It would therefore be prudent to look at a more realistic time period, depending on the delay reasons.</p> <p>Clause 2.3.7. FERA members understand that a blanket extension to all could lead to some gaming and therefore we support the proposal that the RAs shall assess each extension request on a case by case basis.</p> <p>Clause 2.3.9. Whilst this is being viewed as an interim measure we would suggest that any auction that has a delayed start and therefore a limited period prior to the start</p>	
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		<p>of the capacity year, should be treated in a similar way. We hope that the System Operators will aim to initiate T-1 auctions in a timely manner but any reduction in development times could impact auction participation.</p> <p>Clause 2.3.10. The delay in the LSD should not have a significant impact on Substantial completion except to give the participant more time to get there. This would also need the approval by the RAs on the case-by-case basis.</p> <p>Proposed Legal Text</p> <p>J.5.7.3 makes reference to consultation with the System Operators. The reason for the identified delay may require the RAs to consult with the TSO or other relevant authorities.</p> <p>J.5.7.5 suggests that the application should be 20 working days before the start of the year. The publication of the approved auction results shall not be until the 07/09/2023 and therefore there shall only be 17 working days before the start of the 2023/2024 capacity year.</p>	<p>J.5.7.5 Any application made to the Regulatory Authorities under J.5.7.1 should be made at least 15 Working Days prior to the start of the applicable Capacity Year</p>

NB please add extra rows as needed.