



Response to Statutory Consultation on Capacity Market Rules Change
Proposals

Balancing Services

Question 1: Do you have any comments on the proposed revised governance framework and change process for the Relevant Balancing Services?

- We agree that category 1 and 3 intertrips should be excluded from the relevant balancing services, and that category 2 and 4 intertrips should be included in the relevant balancing services.
- We agree that dynamic containment, dynamic moderation, and dynamic regulation should be included in the relevant balancing services.
- We support the proposal to monitor the standardisation of the DNO level services and establish if these need to be captured under the RBS framework to incentivise efficient market behaviour.

Question 2: Do you have any comments on the specific Rule amendments proposed in Annex A?

- No comment, save as addressed above and below.

Question 3: Do you have any comments on the definitions of “Declared Availability” and “Contracted Output” outlined in Table 4?

- We agree with the proposed definitions.

Planning Consents

Question 4: We believe the process for an Applicant to declare that RPC has been obtained is no different to the existing process where the declaration is made within the Portal via a checkbox. Do stakeholders foresee any further changes required to be made to the existing declaration process to facilitate our proposal?

- We oppose the proposal to require applicants to submit the maximum output capacity allowable under their RPC alongside the RPC declaration, as we believe this may adversely affect competitive advantages and allow reverse-engineering of operational models.



Question 5: In scenarios where capacity is required to be redistributed among components, specifically where RPC has been deferred, do stakeholders believe that deadlines should be prescribed to ensure these changes are enacted before confirmation of entry to the relevant Auction?

- Yes, we believe this would result in a consistent treatment of this issue.

Capacity Market Register

Question 6: Do you have any comments on the Rule drafting provided in Annex A?

- No comment, save as addressed above or below.

Further Amendments: Maximum Obligation Period

Question 7: Do you agree with our suggestion to amend the definition of Maximum Obligation Period to allow greater flexibility for Prospective Generating CMUs in selecting a Capacity Agreement length?

- Yes, we believe this would be helpful.

Question 8: Do you foresee any unintended consequences as a result of implementing this proposal?

- We do not foresee any unintended consequences of the proposed change.