

Dear sirs,

Please find attached, on behalf of FCC Environment, our answers to the aforementioned consultation

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

No, we are not affected in the current regime as we are not feeding with our assets into the transmission system. If relevant balancing services are extended into DNO space many aspects in that area have to be considered to meet the requirements. This is a different discussion to be held at the time.

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

No, all clear and acceptable

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

No, this does not apply to DNO connected assets.

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?

No, the proposed changes are simplifying the process.

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 it needs to be clear at auction time what the contractible capacity is.

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

No

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, good suggestion as 15 years often are too long as CMUs might have to adjust to market or environmental demands during that time.

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

No.

Kind Regards

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