

Statutory Consultation on Capacity Market Rules change proposals:

Response from: Flexitricity Limited

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

Flexitricity supports the proposed changes, save that there should be a minimum fixed schedule for review (e.g. annually), which can be supplemented by additional reviews, at the discretion of the Delivery Body, Secretary of State or Authority; the decision on whether to review should not be entirely discretionary. It would be useful for Capacity Providers if the results of at least one annual review were published before the opening of the prequalification window in any given year.

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

There should be a minimum fixed schedule for review (e.g. annually), which can be supplemented by additional reviews, at the discretion of the Delivery Body, Secretary of State or Authority; the decision on whether to review should not be entirely discretionary.

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

Flexitricity agrees with the definitions as stated.

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?

Flexitricity supports this proposed change.

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?

Flexitricity does not have a strong view on this requirement.

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

Flexitricity has no comments on the proposed changes to the Rules.

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?

Flexitricity supports this proposal.

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

We do not foresee any material unintended consequences.