

**Response to EMR Statutory Consultation on changes to the Capacity Market Rules
pursuant to Regulation 79 of the Capacity Market Regulations 2014**



Astra Ventures is a low carbon and renewable energy infrastructure developer and advisor with headquarters in London, developing project portfolios in new markets as battery storage and renewables plus storage, in the UK and internationally. Amongst several other initiatives, Astra Ventures

Astra Ventures welcomes the opportunity to respond to this Ofgem consultation on changes to the Capacity Market Rules 2014

Astra Ventures view on Proposed Amendment CP190, amending rule 3.7.1

Proposed amendment CP190 (National Grid) seeks to amend Rule 3.7.1 to remove the option for Applicants to defer provision of Relevant Planning Consents until after Prequalification, and Ofgem are minded to take forward this proposal.

Astra Ventures understands and accepts Ofgem and National Grid findings on the costs outweighing the benefits of having a deferral option, but if the modification proposed should apply for the CM auctions 2016-2017 (T-4 December 2017?, T-1 Q1 2018?), it would constitute a damage for all those companies that had plans for bringing new sites on the market.

The sites identification, legal audits and planning procedures can take 6-9 months, and on the 23rd of March 2017 when this consultation was issued Astra Ventures had already invested on sites that will see planning procedures completed between August and November 2017, sites that if the amendment would be applied to next CM rounds rules will not be eligible in participating.

Understanding that this situation is shared with other market players, Astra Ventures request for the Amendment CP190 to be applied from April 2018, after the 2016-2017 CM Rounds.