

APPENDIX C – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	Energia
Type of Stakeholder	Generator
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CAPACITY MARKET CODE MODIFICATIONS CONSULTATION COMMENTS:

ID	Proposed Modification and its Consistency with the Code Objectives	Impacts Not Identified in the Modification Proposal Form	Detailed CMC Drafting Proposed to Deliver the Modification
CMC_05_19 - General Housekeeping Modifications v.2	Energia are satisfied that each of the proposed modifications within CMC_05_19 are facilitating CMC objectives of providing transparency.	Energia are not aware of any impacts in the Modification Proposal Form which have not been identified.	Energia are satisfied that the drafting to be included in the CMC to deliver the Modification is accurate and will implement the Modification as intended.
CMC_06_19 - Modification to the Proportion of Delivered Capacity calculation v3	Energia recognize the intention of the proposed Modification to clarify the Proportion of Delivered Capacity (PDC) calculation and for this to be measured against Awarded New Capacity rather than Initial Capacity, thereby recognizing the potential scenarios for Awarded New Capacity to be less than de-rated Initial Capacity after qualification.	As per our response to the previous question, the drafting of the Modification Proposal is unclear and it is therefore uncertain how the implementation of the proposal will work across all technology types and if there are any impacts not identified.	As per our previous responses, it is unclear how the detailed CMC drafting will implement the modification across all technology types. Clarification to the drafting in respect of this is required.

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	<p>Whilst acknowledging and supporting the general intent of the proposal, upon review of the Modification and the proposed changes to the legal drafting of the CMC, it is not clear if this will be implemented in a fair and consistent manner across different technology types. In order to implement what we understand to be the intention of the Modification proposal the amendments to the CMC must be carried out in a manner which allows equal treatment of various types of generation.</p> <p>For example, a storage unit’s De-Rating Factor (DRF) calculation is determined by two parameters; 1) initial capacity; and 2) duration (or Initial Maximum on Time (Total)). However it is not clear if the Initial Maximum on Time (Total) parameter can be amended between auction qualification and actual bidding in the auction itself. The implementation of the modification must allow for appropriate flexibility to amend both of these parameters providing the Awarded New Capacity is less than or equal to the -Gross De-Rated Capacity the unit received during qualification. This would allow for any change to either of the DRF parameters (initial capacity and Initial Maximum on Time (Total)) of the generation unit between qualification and</p>	<p>Accordingly we re-iterate the position that the modification should allow for amendments in all relevant DRF parameters providing that the final Awarded Capacity volume is equal to or less than the Gross DRF capacity from qualification (and matches the Gross DRF capacity that would have been allocated to that unit in qualification given the relevant technical characteristics of the unit that will eventually be built out).</p>	

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	<p>bidding in the auction providing the final Awarded Capacity volume is equal to or less than the Gross DRF capacity from qualification (and matches the Gross DRF capacity that would have been allocated to that unit in qualification given the relevant technical characteristics of the unit that will eventually be built out).</p> <p>It is important that the implementation of the Modification provides this flexibility in order to promote the objectives of the CMC as outlined in the proposal. Energia’s support of the modification proposal is conditional upon the proposed changes to the legal drafting of the CMC delivering upon the intent of the modification across all relevant technology types.</p> <p>As a separate point, it should be noted that the proposed Legal Drafting changes to the CMC contained within Mod_06_19v3 are not clearly highlighted within the paper. This should be a pre-requisite for Modification Proposals so that the proposed legal drafting changes can be clearly identified from reviewing the paper.</p>		

NB please add extra rows as needed.