

RESPONSE TO COMMENTS ON RC374

Submitted by	Reference	Comments	Response
SP Services	Annex 1 – Proposed Modifications to the Market Rules, Section 5.4C – Registration Of Pseudo Generation Settlement Facilities By Market Participants	<p>1. We would like to clarify if the name-plate rating in the following sections is referring to MWac or MWp:</p> <p>5.1.9A A person that intends to participate in the <i>real-time markets</i> or cause or permit a <i>physical service</i> to be conveyed into, through or out of the <i>transmission system</i> from one or more <i>intermittent generation facilities</i> that are not embedded <i>intermittent generation facilities</i> having individual name-plate rating of less than 10 MW may register such <i>generation facilities</i> as a <i>generation settlement facility</i> pursuant to section 5.4C.</p> <p>5.4C.7.1 for additions or removals of an <i>intermittent generation facility</i> with name-plate rating of more than 1MW, the <i>market participant</i> submits the approved <i>standing capability data</i> of that <i>intermittent generation facility</i> by the <i>PSO</i> to the <i>market support services licensee</i>; and</p>	In the market rules and market manuals, the name-plate rating of each given facility (including that of an intermittent generation facility) shall be its alternating current output capacity.
SP Services	Annex 1 – Proposed Modifications to the Market Rules, Section 5.4C – Registration Of Pseudo Generation Settlement Facilities By Market Participants	<p>2. We propose to also include the following under Section 5.4C to reiterate the MP’s obligations:</p> <p>“MP shall:</p> <ul style="list-style-type: none"> • Identify and provide the MSSL with the list of meters (along with details of the solar PV installation, including but not limited to the premises address) tagged to the pseudo GSF; • Provide confirmation to the MSSL the list of meters tagged to the pseudo GSF upon set-up of the generation account; 	We note SP Services’ proposal and have reiterated the MP’s obligations as part of the metering requirements in Page 4 and Appendix C of the Application form for Pseudo Generation Settlement Facility Registration by a Market Participant (NEW).

		<ul style="list-style-type: none"> • Inform the MSSL for any subsequent updates to the pseudo GSF; and • Install, commission, maintain, replace, repair and test each meter installation to ensure they are in good working conditions, have been tested for accuracy by accredited laboratory, and meet the applicable standards described in the Metering Code.” <p>The above responsibilities have been included in our feedback to EMA’s consultation paper and have been acknowledged by EMA in its Final Determination Paper ‘Registration Of Pseudo Generation Settlement Facilities By Aggregating Standalone Intermittent Generation Sources For Market Participants’ with no objections.</p>	
SP Services	Annex 2 – Application form for Pseudo Generation Settlement Facility Registration by a Market Participant (NEW)	We note that the Application form for Pseudo Generation Settlement Facility Registration by a Market Participant does not include an Appendix for Metering Details. We propose to include an Appendix for Metering Details, similar to Appendix A in the Application form for Generation Facility Registration by a Market Participant, to facilitate the registration of the Pseudo Generation Settlement Facility.	We note SP Services’ proposal and have included metering details in Question No. 11 and Appendix C of the Application form for Pseudo Generation Settlement Facility Registration by a Market Participant (NEW).