

RC_2013_10: Harmonisation of Supply-Side and Demand-Side Capacity Resources

Submitted by

Name:

used. In particular, we note that the Amending Clause 2.35.3C requires that five minutes prior to a Trading Interval, the participant must provide to System Management (via the B2B Web Service) both the current consumption of the Demand Side Programme, plus the consumption of each Associated Load within the programme. On the face of it, this seems to be an excessive level of detail. We also note that individual market participants are expected to incur a cost in the range of \$100,000 to \$200,000 each, which is comparable to the costs to be incurred by both System Management and the IMO. The likely upshot of this will be to exclude from the market sufficiently small Associated Loads because of the disproportionate telemetry costs. This will effectively disadvantage small DSM Providers and lock out smaller customers from the cost reduction benefits offered by DSM.

2. Please provide an assessment, whether the change will better facilitate the achievement of the Market Objectives

Community considers that the Rule Change considerably improves Market Objective a (economic efficiency) and on balance significantly improves Market Objectives b (promoting competition) and c (avoidance of discrimination). That said, however, we are concerned that the telemetry requirements discriminate against small participants and potentially exclude small customers from participation.

3. Please indicate if the proposed change will have any implications for your organisation, (for example changes to your IT or business systems) and any costs involved

Not applicable

4. Please indicate the time required for your organisation to implement the change, should it be accepted as proposed

Not applicable
