

**Response to comments on RC 348: Registration of Non-exporting Embedded Intermittent Generation Facility**

Submitted by	Reference	Comments	EMC's response												
<b>Comments on the "Calculation Methodology and Payment Schedule for the Fixed Market-Related Charge" (in Annex 6)</b>															
EMC Finance	Table 1 and Table 2	<p>We note that the updated WAFP and Estimated Solar Generation Profile for each upcoming half-year period is proposed to be published by 20 June and 20 December, and MPs are required to pay the FMRC 3 business days before the last day of the current half-year period.</p> <p>MPs for NEIGFs may therefore only have 4 to 5 business days of lead time to pay.</p> <p>We suggest shifting forward the data range used to calculate the WAFP for each half-year period by one month, so that the updated WAFP can be published earlier, thereby giving MPs longer payment lead time. This is especially since the FRMC will not be directly debited from such MPs' bank accounts.</p>	<p>We agree with the proposal and have amended the data range used in the WAFP calculation (in Table 1) and the date that EMC will update the WAFP and Estimated Solar Generation Profile (in Table 2) as follows:</p> <p style="text-align: center;">Table 1: WAFP Calculation Data Range</p> <table border="1" data-bbox="1234 624 2018 895"> <thead> <tr> <th data-bbox="1234 624 1491 692">Half-year period</th> <th data-bbox="1496 624 2018 692">Data Range</th> </tr> </thead> <tbody> <tr> <td data-bbox="1234 695 1491 794">1 Jan to 30 Jun of year x</td> <td data-bbox="1496 695 2018 794">AFP for 1 <del>Jun</del><u>May</u> year x-1 to 30 <del>Nov</del><u>Oct</u> year x-1</td> </tr> <tr> <td data-bbox="1234 798 1491 895">1 Jul to 31 Dec of year x</td> <td data-bbox="1496 798 2018 895">AFP for 1 <del>Dec</del><u>Nov</u> year x-1 to 31 <del>May</del><u>Apr</u> year x</td> </tr> </tbody> </table> <p style="text-align: center;">Table 2: Date that EMC will update WAFP and Estimated Solar Generation Profile</p> <table border="1" data-bbox="1234 995 2018 1331"> <thead> <tr> <th data-bbox="1234 995 1491 1129">Half-year period</th> <th data-bbox="1496 995 2018 1129">Date that EMC will update WAFP and Estimated Solar Generation Profile</th> </tr> </thead> <tbody> <tr> <td data-bbox="1234 1133 1491 1232">1 Jan to 30 Jun of year x</td> <td data-bbox="1496 1133 2018 1232">On or before 20 <del>Dec</del><u>Nov</u> of year x-1</td> </tr> <tr> <td data-bbox="1234 1235 1491 1331">1 Jul to 31 Dec of year x</td> <td data-bbox="1496 1235 2018 1331">On or before 20 <del>Jun</del><u>May</u> of year x</td> </tr> </tbody> </table>	Half-year period	Data Range	1 Jan to 30 Jun of year x	AFP for 1 <del>Jun</del> <u>May</u> year x-1 to 30 <del>Nov</del> <u>Oct</u> year x-1	1 Jul to 31 Dec of year x	AFP for 1 <del>Dec</del> <u>Nov</u> year x-1 to 31 <del>May</del> <u>Apr</u> year x	Half-year period	Date that EMC will update WAFP and Estimated Solar Generation Profile	1 Jan to 30 Jun of year x	On or before 20 <del>Dec</del> <u>Nov</u> of year x-1	1 Jul to 31 Dec of year x	On or before 20 <del>Jun</del> <u>May</u> of year x
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EMA	Section 3	<p>We note that EMC is currently proposing to charge new NEIGFs the FMRC for the full month that the facility intends to be registered, regardless of the actual date of registration.</p> <p>We should minimally pro-rate the estimated charges based on the number of days as per the NEIGF's requested registration start date. EMC should inform the consumer that there will not be a refund if there is any delays and advise on reasonable registration start date.</p>	<p>EMC had proposed charging the FMRC based on the full month that the facility intends to be registered, as it is quite common that the MPs are not able to pinpoint an exact start date.</p> <p>We note EMA's comments and have amended the methodology accordingly to reflect this. However, please note that an MP would also not have the flexibility to bring forward the actual start date even if they were able to turn-on earlier.</p>
EMA	Appendix 1	<p>The solar generation factor shown in Appendix 1 is for illustration only.</p>	<p>We note EMA's comments and have amended the methodology accordingly to reflect that the data shown in Appendix is for illustration only.</p> <p>However, for transparency and clarity on the derivation of both the WAFP and the ESGQ, we recommend publishing the estimated solar generation profile (and its half-hourly breakdown). This will facilitate MPs in reconciling the charges, and, in future, assist MPs in deciding the metering options to adopt (i.e. install physical meter or estimate output using IGS profile).</p>