



Zenobe Response to Workgroup Consultation on CMP331: Option to replace generic Annual Load Factors (ALFs) with site specific ALFs

What could be considered acceptable evidence as part of the independent assessment for the ESO to verify whether the site specific ALFs are a fair and realistic forecast?

We agree with the Proposer that ALFs should reflect the 'individual characteristics of the generator' and that they should be aligned with the 'extent to which the generator is using the wider transmission network'. We note that this principle also guides 'CMP393: Using Imports and Exports to Calculate Annual Load Factor for Electricity Storage'.

We agree that a party wishing to use a site-specific ALF should submit a forecast ALF to NGENSO, and that this forecast ALF should be verified by an independent third party.

We agree that wind developers could use long-term export units for sites, such as those used in energy yield assessments that form part of independent project feasibility studies. Similarly, storage operators could submit long-term export (and potentially import – see CMP393) forecasts from revenue forecasts by third party consultants. Operators should only submit throughput / cycle data, as other information in revenue forecasts is commercially sensitive.

Should there be any legal obligations on Users to be fully open and transparent with the independent third party and the ESO when calculating a site-specific ALF?

We agree that storage operators should be fully open and transparent on throughput / cycle data.

Do you agree CMP331 only applies to new generators or should existing generators retrofitting new plant be eligible?

We agree that site-specific ALFs should apply only to new generators, and that CMP331 should not apply to retrofitted plant.

Do you wish to raise a Workgroup Consultation Alternative request for the Workgroup to consider?

We do not want to raise a Workgroup Consultation Alternative request.

Do you believe that reconciliation of Generic or site-specific ALFs to actual ALFs should take place? And if so whether the reconciliation of charges would cause issues for Parties.

We do not think that site-specific ALFs should later be reconciled with actual ALFs.

Do you believe that CMP331 Original proposal better facilitates the Applicable Objectives?

We think that CMP331 Original better facilitates the ACOs.

Do you support the implementation approach?

We support the proposed implementation approach.