

APPENDIX C – RESPONSE TEMPLATE

-23-SUMMARY INFORMATION

Respondent's Name	<i>Demand Response Association of Ireland</i>
Type of Stakeholder	<i>Industry association of demand response aggregators in Ireland.</i>
Contact name (for any queries)	<i>Eoin Sweeney</i>
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Confidential Response	[N]

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_10_23: Mitigation of Impact on Participants Relating to 3rd Party Gas Connection Delays	No comment.		

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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_11_23: Amendment to Drafting Introduced Under Modification CMC_15_22	No comment.		
CMC_12_23: Facilitation of Unit Specific Price Caps for Existing Capacity in Excess of the Auction Price Cap	No comment.		

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<p>CMC_13_23: Min Completion Prior to Long Stop Date</p>	<p>DRAI supports the general principle of CMC_13_23 which seeks to amend the current practice adopted by the SO's whereby if Minimum Completion has been achieved but Substantial Completion has not, a Party has to wait until the Long Stop Date to receive their Capacity payment. However, DRAI believes the proposed wording should be modified as outlined below.</p> <ol style="list-style-type: none"> 1) Restricting to the application of the proposal in CMC_13_23 to the start of the Capacity Year should be removed. 2) To ensure consistency, the language used in J.6.1.4A (a) should mirror the language used in J.6.1.4 (a) <p>DRAI would support CMC_13_23 if the proposed edits are fully incorporated into the mod.</p>	<p>The current drafting of CMC_13_23 doesn't consider Substantial Financial Completion.</p> <p>Per J.6.1.2 The System Operators shall terminate all the Awarded New Capacity in respect of a new or refurbished Generator Unit or Interconnector in the event that:</p> <ol style="list-style-type: none"> (a) Substantial Financial Completion has not been achieved within the Substantial Financial Completion Period of the Capacity Auction Results Date in the Capacity Auction Timetable for the Capacity Auction in which the capacity was allocated (or such later date as allowed by the Regulatory Authorities under section J.5.2); or (b) Minimum Completion has not been achieved by the applicable Long Stop Date. <p>The edits proposed by DRAI would enable a participant to declare Minimum Completion and terminate any undelivered Awarded New Capacity in advance of the Substantial Financial Completion date, therefore enabling the participant to achieve Substantial Financial Completion on the portion of delivered Awarded New Capacity. This would avoid Awarded New Capacity being terminated which would otherwise be delivered and contribute to system adequacy.</p>	<p><i>J.6.1.4A Where, after the beginning of the Capacity Year, Awarded New Capacity has achieved Minimum Completion but has not achieved Substantial Completion and the Participant acknowledges in an Implementation Progress Report that it does not expect to achieve Substantial Completion by the Long Stop Date:</i></p> <ol style="list-style-type: none"> <i>(a) the System Operators may shall, subject to paragraph J.6.1.5, reduce the quantity of Awarded Capacity to the quantity delivered as determined in accordance with the table in paragraph G.3.1.8 and terminate the remainder; and</i> <i>(b) the Participant in respect of the Awarded New Capacity shall have no entitlement under this Code or the Trading and Settlement Code, and shall have no claim against the System Operators, in respect of any such quantity which has not been so delivered.</i>
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<p>CMC_14_23: Locational Capacity Constraint Violation Criteria</p>	<p>While not supportive of CMC_08_22, DRAI welcomes the further clarity provided by CMC_14_23. DRAI agrees that it is essential that price quantity pairs for the violation of the Locational Capacity Constraint Required Quantity and the Locational Capacity Constraint Maximum Quantity are published within the Final Auction Information Pack.</p> <p>Fundamentally, DRAI believes it is inappropriate for a Capacity Auction to deliberately not procure the Locational Capacity Constraint Required Quantity if able to do so (i.e. provided sufficient Awarded Capacity has qualified within a LCCA). This would unnecessarily introduce risk around security of supply and is not in the best interest of the consumers of electricity across the island of Ireland.</p> <p>DRAI supports the view made by several participants at CMC Workshop 31 which echoed this sentiment.</p> <p>As a result, DRAI believes the price quantity pairs for the violation of the Locational Capacity Constraint Required</p>		
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	<p>Quantity should be orders of magnitude greater than the price quantity pairs for the violation of the Locational Capacity Constraint Maximum Quantity. This will ensure that the auction algorithm massively favours over procuring Awarded Capacity rather than under procuring Awarded Capacity within a given LCCA.</p> <p>DRAI would also like to reiterate our belief that the introduction of Locational Capacity Constraint Maximum Quantity is not an appropriate solution for the SO's Grid Connection problem. The inability of the power system to accommodate new generation only affects New Capacity seeking to connect to the power system for the first time. However, the introduction of a Locational Capacity Constraint Maximum Quantity may result in some Existing Capacity not getting procured in favour of New Capacity which has not yet connected to the power system. Therefore, the concept of a LCC Maximum Quantity doesn't solve the Grid Connection problem and should not be viewed as such.</p>		
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NB please add extra rows as needed.