



Energia Response to SEM_25_001

10/02/2025

Energia welcomes the opportunity to respond to SEM_25_001 on modification CMC_12_24 presented at Capacity Market Code Modification Workshop 40.

Energia acknowledges the issue as set out in CMC_12_24 regarding the correct calculation of the New Capacity delivered as a percentage of total capacity (including Existing Capacity) and the issue of consistent de-rating factors in the calculation. Energia supports the comments of the System Operator at Workshop 40 to the effect that it would be appropriate to bring an expanded modification proposal forward to address the issues outlined and other related issues in the CMC.

The need for an expanded modification reflects that this is an area of the CMC where it is particularly important that the wording is precise, and the definitions referred to are consistent, as they refer to calculations to determine capacity delivery. For that reason, a wholistic modification from the SOs to provide clarity across the CMC in this regard would have been preferable.

Energia has engaged with the proposer directly to clarify the proposed wording of the modification. Energia notes that in the modified version of G.3.1.4 as proposed by CMC_12_24, in part (a) reference to “Awarded Existing Capacity” is replaced with “De-Rated Initial Capacity (Existing)”. However, in part (b), the reference to “Awarded Existing Capacity” remains. Energia’s concern is that there remains a lack of clarity in the wording as to which de-rating factors are being used, and what capacity is being referred to, in the calculation of G.3.1.4.

Following detailed review of the modification, Energia remains unsure that it will achieve the purpose as set out by the proposer, and that it could have unintended consequences in its application or in relation to other parts of the CMC. For that reason, Energia’s preferred approach remains that the SOs bring forward a revised and wholistic modification to address the issues as outlined in Workshop 40.

In the absence of such a modification, Energia would find assurance if the SOs were to examine CMC_12_24 in depth and confirm that its implementation as written would have the impact described in the original modification proposal.