The SEM Committee,
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27th February 2026

Re: SEM-25-070 Options for Decarbonisation of the existing CRM design

Bord Gáis Energy (BGE) welcomes this opportunity to respond to the RA's consultation on '*Options for Decarbonisation of the existing CRM design*.' **BGE is supportive of the principle of introducing *'measures to reduce carbon emissions within the current CRM framework'* which is something we have consistency advocated for over the past few years**. However, this is an exceedingly complex outcome to deliver on, **and both of the proposed approaches will likely increase cost to the consumer without achieving any material decrease in carbon emissions.** In particular given the lack of concrete detail on proposed emissions thresholds, scalar shape, slope, and values. For example, the green scalar slope and magnitude can have a significant impact in terms of the technology it incentivises, and two slightly different design options could result in considerably different outcomes. Finally, it's unclear whether this proposal is aimed at reducing the carbon intensity of existing CRM participants, or sending an investment signal for new dispatchable net zero capacity, or trying to achieve both simultaneously.

Instead of progressing further on either of the proposals, we urge the SEMC to consider BGE's proposed alternative – A 'Linked Green Capacity Auction' – outlined below, which builds on the existing CRM framework allowing the Regulatory Authorities to send a clear decarbonisation signal, maintain system adequacy, while minimising market distortions and the financial impact on the end consumer.

Our High-level position on the SEMC's proposal is as follows:

1. **Green Bonus:** Irrespective of where the emissions threshold is set**, a 1-year bonus is not a sufficiently strong signal to encourage meaningful decarbonisation of plant in the CRM**. Furthermore, the use of a single emissions threshold is a binary approach that will create inefficient outcomes.
2. **Green Scalar:** BGE are **supportive of this idea in principle**, **however we have serious concerns that if applied in a blanket manner, it will increase the cost of the CRM without sending a clear signal to dispatchable low carbon technologies**. Even when used in a targeted, deliberate manner, it would still risk handing a windfall to existing units which are already economically viable and therefore an 'Investment Rate Threshold' is needed to compliment this proposal.

We ask that the SEMC consider an alternative proposal not included in the AFRY report:

3. **BGE Proposal - 'Linked Green Capacity Auction'**: A pre-defined portion of the T-4 requirement would be ringfenced for a Green Capacity Auction, featuring a distinct Green Auction Capacity Price, Green Demand Curve, and eligibility for extended contract durations. Participation would require meeting additional RA-determined Green Qualification Criteria, such as emissions and investment thresholds.
   The Green Auction would occur ahead of the main CRM auction and apply the same de-rating factors. Any ringfenced capacity that fails to clear would be transferred to the main auction through an adjustment of the capacity requirement. A Competition Ratio test could be included to mitigate risks arising from low participation. (*See flow chart on page 9 which illustrates how proposal would work at high-level*)

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Green Bonus

Question 1: Would the Green Bonus create an incentive that market participants can respond to within the timeframe of the remaining auctions under the existing CRM?

No, the Green Bonus will not create a sufficient incentive to incentivize the investment required compared with the status quo. Consider the example below for theoretical OCGT turbine below in the table below.

Volume (MW)		300
De Rating Factor		0.85
Net Derated Volume (MW)		255
Auction Clearing Price (€/KW installed)	€	230,000
Annual Capacity Revenues	€	58,650,000
Assumed WACC (BNE Decision)		7.27%
Nominal Value of Cashflows (10 Years)	€	586,500,000
Net Present Value of Cashflows (10 Years)	€	406,840,584
Nominal Value of Cashflows (Including 1 Year Bonus)	€	645,150,000
Net Present Value of Cashflows (Including 1 Year Bonus)	€	433,942,933
Increase in Nominal Value	€	58,650,000
Increase in Net Present Value	€	27,102,349
Nominal Increase in Contract Value		10.0%
NPV Increase in Contract Value		**6.7%**

Table 1: Example of impact of Green Bonus on 300MW OCGT

In the example above, a 1-year addition to contract value would increase the nominal capacity revenues by ~€58.7m which is €27.2m in net present value terms. **This is insufficient to incentivise significant decarbonisation investment** such as the installation of combustors capable of burning of high blend of green hydrogen or ammonia, a CCS storage set up, etc.

Question 2: Where should the CO2 emissions threshold be set to incentivise higher efficiency gas plant as well as lower carbon technologies? Please provide appropriate evidence and rationale to support

As outlined in our introduction the application of single CO2 emissions threshold is an overly simplistic approach with a binary outcome. **It is not possible to incentivise both higher efficiency gas plant, and low carbon technologies effectively at the same time with a single emissions threshold. For this proposal to work there would need to be multiple emissions thresholds**. Take for example, a *'High efficiency emissions threshold'* to incentivise more efficient gas, and a *'Low carbon threshold'* to incentivise zero/extremely low carbon plant. The '*high efficiency emissions threshold'* would allow plants that have emissions that are less than or equal to that of a highly efficient CCGT, to earn a set number of additional year(s) of contract. This would be required to incentivise the construction of CCGTs ahead of lower cost more carbon intensive OCGTs. Based on the SEMC's latest BNE decision[1] and the Net CoNE for CCGT and OCGT in Ireland, a minimum of 3 additional years of capacity contract would be required keeping all else equal, to build a CCGT vs an OCGT. However, our view is that BNE decision is not a useful reference as it materially overstates expectations of inframarginal revenues and system service revenues etc. In our view an additional 3 year of contract duration would be an insufficient incentive to build CCGT vs an OCGT.

Nonetheless, even if multiple emissions thresholds are used the risk remains a windfall will accrue to that units which are economically viable at current auction prices without any scalar. Therefore, in addition to an emissions threshold, units should also need to pass an investment rate threshold, and meet other RA defined requirements to be eligible

[1] SEM-23-016 Best New Entrant Net Cost of New Entrant, 2026/27 Decision Paper

for a green bonus. This would reduce the risk of unintended negative consequences at expense of the consumer. **In summary, a green bonus approach would require multiple additional layers of complexity to try and deliver the required outcomes and in our view is not appropriate.**

Question 3: Is one year the appropriate additional contract duration?

No, as stated in out answer to question 1, the addition of one year to the contract is insufficient to encourage any kind of meaningful decarbonisation.

Question 4: Is the definition of blended hydrogen-readiness appropriate i.e. that the unit must incorporate combustion equipment that is capable of burning a blend of up to 30% hydrogen? Should a higher/lower percentage blend be applied for the blended hydrogen-readiness definition?

No, it is not. **It is fundamentally incorrect to award units a green bonus, or scalar based on *'the potential to burn a 30% blend of hydrogen'*, without a binding obligation.** There must be a stronger incentive, otherwise it risks simply rewarding plants based on potential and increasing CRM costs without any material carbon emissions reduction.

The RAs should clearly outline at the point of auction qualification, the obligations in terms of emissions verification and financial consequences for non-compliance with these. For example, '*Units whose actual emissions materially diverge from the levels stated at contract award should have their green bonus/green scalar prorated downwards to reflect the duration of contract period during which their emissions exceeded the basis on which the award was granted.'* For example, a unit which spent 5 years running on 100% natural gas, and 5 years running on 30% hydrogen blend would mean for a green bonus, the extra year(s) being reduced by half, or for a green scalar it being reduced by half.

Green Scalar

Question 5: Would the Green Scalar create an incentive that market participants could respond to within the timeframe of the remaining auctions under the existing CRM?

The Green Scalar could create an incentive for market participants to decarbonise, and in principle BGE is supportive of the idea. However, having conducted in-depth analysis and modelling of the likely outcomes, **we believe that it would be extremely difficult to design a green scalar that delivers the intended outcomes, without creating unintended negative consequences**. These would likely include increasing the capacity market costs across the board without materially incentivising a change in behaviour, providing a windfall to existing units/already economically viable new units, and requiring significant subjective Regulatory Authority decision making. For example, the RAs would need to determine, the slope of the scalar, the point at which emissions threshold(s) apply (*aka inflection points in the curve*), whether to include multiple emissions threshold etc. **For this reason, we believe BGE's alternative proposal of a 'Linked Green capacity auction' is more suited to deliver the desired outcomes.**

BGE has conducted analysis which examines the high-level impact of applying a variety of 'scenarios' of Green Scalar implementation on the 2028/29 T-4 Auction, in terms of auction cost. *(it is not possible to determine what different technology would have cleared as a result of the scalar. However, we can get a view on the likely impact of a green scalar on total auction cost versus the baseline. In this analysis assumptions were made on the emissions intensities for different technology types.)*

- **Baseline:** This is the actual outturn of T-4 2028/29 Auction - The nominal contract value of the cleared volume for the 2028/29 T-4 Auction is ~€3bn (*calculated as derated volume x capacity payment price x duration*)
- **Option 1 - Simple Linear Green Scalar:** In this scenario a simple linear scalar applies for all units which starts at 1 at 550gCO2/KWh, increasing linearly to 2 at 0gCO2/KWh.
- **Option 2 – Simple Linear Green Scalar for Multiyear contracts only:** In this scenario a simple linear scalar applies for all units which starts at 1 at 550gCO2/KWh, increasing linearly to 2 at 0gCO2/KWh. Excludes existing capacity not making significant investment, on the basis that 1 year contract is not an investment signal.

- **Option 3 – Graduated Curve for Multiyear contracts only**: Instead of linear curve, the Scalar would remain at 1 from 550gCO2 (*the capacity market emissions limit*) all the way to 375gCO2/KWh which represents a baseline emissions for a CCGT at 54% efficiency *(this efficiency choice of 54% is for illustrative purposes)*. From this emissions threshold of 375gCO2/KWh, the scalar would increase linearly up to 2 at 0gCO2/KWh. Again, this would only apply to multi-year contracts, not existing capacity.

Figure 1: Comparison of Green Scalar Options 1-3, Linear Curve, vs a Graduate Curve with an inflection point

Scenario	BAU - 2028/29 T-4 Notional € Contract Value (inc 10 years)	Option 1: Linear Scalar, Exisitng and New Capacity	Option 2: Linear Scalar, New Capcity Only	Option 3 Graduated Scalar, New Only
Cost € Billions	2.9	4.3	4.0	3.5
Delta vs BAU		1.4	1.1	0.6
% Increase BAU		46%	36.6%	19.4%

Table 2: Comparison of the financial impact of different Green Scalars Options

As outlined in table 2 above, Option 1 and 2 are suboptimal as they result in a significant increase on capacity cost compared with the Baseline. Option 1 would increase the cost by ~€1.4bn, and Option 2 would still result in a cost increase in excess of €1bn even when applied to multi-year contracts only *(reason for this is the high volume of multiyear contracts issue who would still be eligible).* **This is a function of simple scalar increasing above 1 as soon as emissions drop below the capacity market limit of 550gCO2/KWh *(i.e. the entire capacity market).*** Option 3 significantly reduces the cost relative to Option 1 & 2 by ensuring that it is targeted and only starts providing an uplift once emissions start reducing below that of an 54% efficient CCGT. However, there is still a fundamental issue. Even with option 3, the more targeted approach risks passing a windfall to capacity which has already proven to be economic at current auction clearing prices. Therefore, any implementation of a scalar would need to be matched with an Investment rate threshold to ensure the uplift in capacity revenue is justified based on increased capex spend.

Question 6: What are the appropriate CO2 emissions thresholds that should apply for the Green Scalar? Please provide appropriate evidence and rationale to support.

The concrete recommendation BGE would make is that the green scalar >1 should only apply for new capacity, and below the emissions threshold of a baseline CCGT efficiency *(in this illustrative example deemed as 54% efficiency or*

375gCO2/KWh). This ensures that only reductions in average emissions intensity are incentivised, rather than rewarding emissions reductions relative to the capacity market emissions limit of 550gCO2/KWh, which is an outright maximum not a target.

We note the use of plural in the question on emissions threshold(s) which implies the use of multiple emissions thresholds. The answer to this question very much depends on exactly what kind of behaviour and technologies the RAs are looking to incentivise. It could be effective to have different thresholds, at which the slope of the scalar curve becomes progressively steeper. See example of this in figure 2 below.

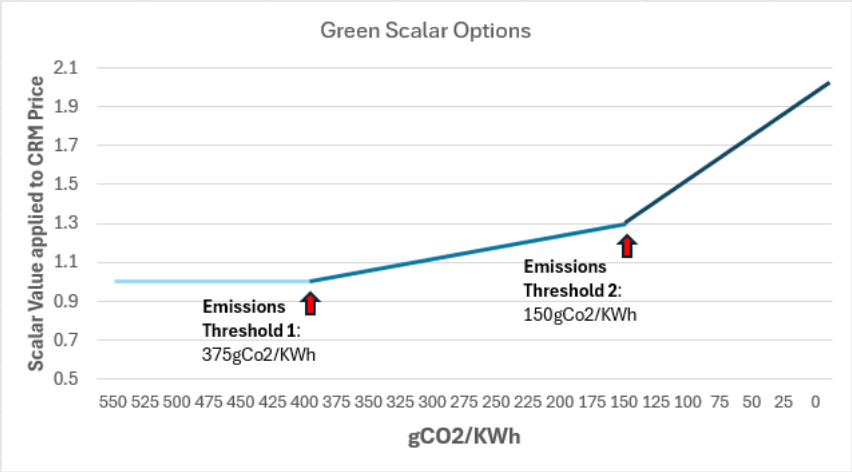

Figure 2: Example of a Graduated Green Scalar Curve with multiple inflection points

Question 7: Should the Green Scalar be a continuous or stepwise function?

The scalar should be a graduated curve similar to the one in figure 2 above. If a stepwise function is used there is an inevitability of units with different emissions intensities scoring equally in terms of the scalar, which is inherently unfair. See illustrative example below which illustrates that for two units with different emissions intensities that sit along the horizontal aspect of the stepwise curve are treated equally in terms of a scalar. **We firmly disagree with the proposal of use of a stepwise function**.

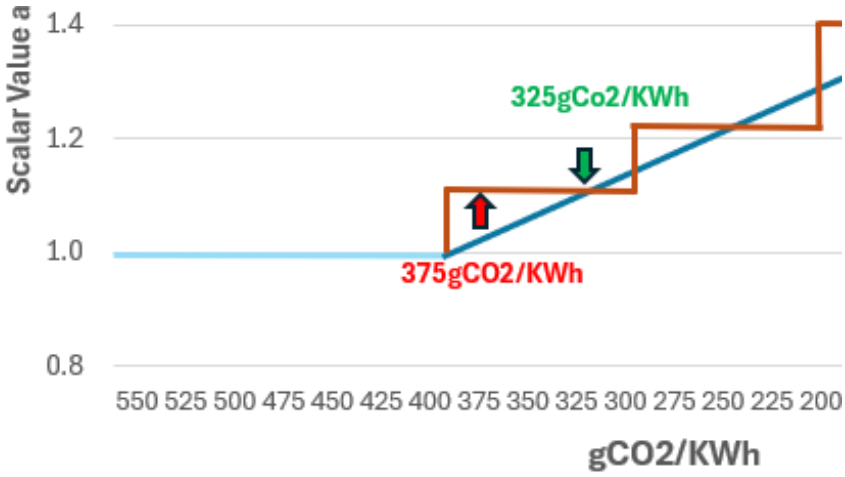

Figure 3: Comparison of Stepwise Scalar Curve and a Linear Scalar Curve

Green Scalar and Green Bonus

Question 8: Which of these two options – the Green Scalar or the Green Bonus – do respondents consider is likely to be more effective within the timeframe of the remaining auctions under the existing?

As outlined in the Introduction and in the answer to question to 15, **we strongly believe that the proposal of a 'Linked Green Capacity Auction' would be more effective in terms of cost and emissions reduction than either of the SEMC's proposals.**

As outlined in our answer to previous questions, we believe the Green Bonus as proposed would have a negative impact increasing costs without any incentive to reduce emissions, and so the Green Scalar is more likely to be effective in the remaining auction under the existing timeframe. However, this is contingent on the scalar curve shape being designed to incentivise the desired technology type and paired with an investment rate threshold. It therefore is reliant on a large amount of nuanced regulatory intervention to drive the desired outcomes.

Question 9: What technologies could be expected to benefit from the Green Bonus or the Green Scalar in the specified timeframe? a. For each technology referred to, what is the associated scale of and timeframe for investment for an existing or a new plant?

It is difficult to answer this question without knowing the exact details on the input parameters such as emissions thresholds, added contract durations, slope of the scalar etc. Depending on the decisions made on the parameters, a wide range of technologies could benefit from these proposals including but not limited to: BESS, DSUs, Interconnectors, RES-E, Green Fuel Turbines, HVO Fuelled OCGTs, CCUS Gas Turbines etc.

It is important to recognise that the technologies incentivised by the proposed CRM decarbonisation signals will depend critically on how those signals are designed and integrated into the market framework. This places a high burden on the SEMC to ensure that the intended outcomes are effectively incentivised. To date, most new capacity awarded multi-year CRM contracts has been gas-fired OCGT. Under current rules for classifying renewable fuels, a strengthened decarbonisation signal could therefore create a strong incentive for OCGT fuelled by HVO, which is classified as a renewable fuel. This would shift dependence from imported fossil fuels to imported HVO, with implications for energy security, exposure to fuel price volatility and availability, and the risk of future changes to fuel classification. The SEMC should carefully consider the desired system-wide outcomes and ensure that the market design incentivises technologies accordingly.

Question 10: What is the expected commercial running pattern for each technology and are there constraints on its flexibility?

As stated in response to our answer to question 9, it is not possible to take a view on the specific which technologies are likely to benefit. Table 4 below has some examples, but we must stress is only indicative and non-exhaustive list.

Technology	Expected Commercial Running Pattern	Constraints on Flexibility
Demand Side Unit	Demand Turn down (Peak shaving only)	High price needed for activisation.
Interconnector	Dispatch Driven by Ex-ante energy price differentials between countries	Dispatch decision is outside of control of asset owner so should not be considered dispatchable in a conventional sense. Net Transfer Capacity (NTCs) Reductions can be applied by TSOs on either side of the I/C. Emergency SO trades can alter flows at great cost.
BESS	Exporting Power across peak, importing power at daily price nadir	Limited by battery duration, capacity on the network to recharge, possibly SO prescribed operational envelopes, and need a significant price arbitrage between peak and nadir at present due to high network charges etc.

HVO/Biomethane OCGT	Running for small number of High prices/across periods of Dunkleflaute	High operational cost of alternative fuel, likely limited onsite fuel storage capacity and possible issues sourcing a firm supply of alternative fuel. Assumption is biomethane will not be injected into gas networks at scale by 2030.

Figure 4: Indicative High Level Commercial Running Patterns and Flexibility constraints on potential technology types

Question 11: What verification process should apply to ensure compliance with the emissions thresholds for either measure?

Emissions should be measured by the EPA using existing processes as is the case for units under the ETS scheme. Rigorous emissions verification should be completed to ensure compliance against what was promised in qualification. For example, if an OCGT submitted emissions based on 30% hydrogen blend then the emissions must comply with this, and non-compliance should result in downwards prorating of the award until such time that emissions comply.

It is important to acknowledge that Interconnector Units will face inherent challenges in providing a credible estimate of their emissions intensity, given that this requires forecasting the carbon emission profile of the GB power system many years in advance. A pragmatic approach would be for Interconnectors to adopt a conservative assumption for average emissions intensity, compare this against actual outcomes, and then make retrospective adjustments on a pro-rata basis where deviations arise. The revenue floor within the Cap-and-Floor framework provides a safeguard that ensures economic viability is not compromised. However, it is essential that Interconnectors are not, under any circumstances, assumed to have zero emissions, as this would undermine the integrity of the decarbonisation signal.

Emissions Data and Decarbonisation Declaration

Question 12: Do you agree with the proposal to publish the carbon emissions data submitted at qualification by successful units, and where relevant, ex-post data provided by successful units?

Yes, this is a pragmatic proposal, and we strongly support the idea of increasing transparency around the deemed emissions of successful units. It is very important that the actual emissions are monitored ex post to ensure the emissions reductions can be effectively measured against what was stated to avoid gaming. For example, units which base their deemed emissions off running on a 30% hydrogen blend but actually run on 100% natural gas should have their scalars set back to one, until the point at which they comply with their original deemed emissions.

Question 13: How effective do respondents consider the proposed "Decarbonisation Declaration" would be?

We are firmly opposed to this proposal and believe it is not possible for this to be enforceable, nor would it have any legal standing. **Instead, compliance with the deemed emissions must be part of the actual decarbonisation design.** Failure to do so would expose this proposal to gaming and risk undermining our emissions targets at the expense of the end consumer.

Question 14: Is the proposed content of the "Decarbonisation Declaration" sufficient? Could other elements be included e.g. feasibility study, interim targets?

No, as stated in our answer to question 13, the "Decarbonisation Declaration' is not a sufficiently robust tool to quantify or confirm emissions reductions and could undermine the effectiveness of any decarbonisation measure.

'Other Measures'

Question 15: Do you consider that any of the other measures discussed in the accompanying AFRY Assessment Report, or any measures to achieve decarbonisation that not identified by AFRY, should be considered further by the SEM Committee? If so, please state clearly if your view relates to the timeframe of the present workstream (lifetime of the existing CRM) or longer-term CRM development. If so, please provide supporting evidence.

Yes, other measures not identified by AFRY should be considered by the SEM Committee. As outlined throughout our response, we have thoroughly analysed the proposed measures and have **reached the firm conclusion that neither of the proposed options of the Green Bonus or the Green Scalar, will be effective in delivering on the stated outcome. They risk significantly increasing the cost of the CRM without a tangible reduction in carbon emissions. Instead**, **we urge the SEMC to consider BGE's proposed alternative – a 'Linked Green Capacity Auction' –** outlined below, which builds on the existing CRM framework, allowing the Regulatory Authorities to send a clear decarbonisation signal, maintain system adequacy, while minimising market distortions and the financial impact on the end consumer.

The 'Linked Green Capacity Auction'

In this proposal the RAs would determine a pre-agreed volume of the capacity market auction requirement that would be ringfenced for the 'Green Capacity Auction'. This ringfenced auction would be run in parallel to the main auction but limited to units that meet the RA prescribed '*Green qualifying criteria'*. Units which meet these green criteria would have the same De-Rating factors applied as the standard auction to ensure system adequacy. These green units would be eligible to bid up to a higher 'Green Auction Price Cap' (GAPC) and for longer contract durations.

Allowing longer contract durations for green assets follows the precent of closing the gap between contract durations and asset lifetimes in ORESS Tonn Nua[2], while other EU Capacity Mechanisms such as the Belgian Capacity Mechanism has introduced the use of longer contract durations of up to 15 years, allowing greater smearing of costs. Increasing the contract duration would reduce the annual costs and extend the period of Reliability Obligation consumer protection. A 'Pay as Clear' approach would be used, as is the case in the existing auction.

In order to ensure a sufficiently competitive green auction, the Regulatory authorities could determine a '*Competition Ratio'* using a similar approach to that taken in the RESS[3]. In the event the RAs deemed there be insufficient competition, the green auction would not go ahead, with the ringfenced volume transferred back to the main auction, and an adjustment applied to the main auction demand curve. Finally, in this Green auction scenario, it would also be very helpful for the RAs to set a glidepath of the volumes of 'Green' capacity they are looking to procure over a set period of years, with flexibility to adjust the annual target as they deem fit.

This approach would maintain technology neutrality which is a key tenet of the exiting CRM state aid approval, and would allow various green projects to compete with each other on an even playing field without risking distortion of auction dynamics, or the price for standard capacity. Keeping the 'Green Capacity Auction' as a linked side auction to the main auction means that any of the 'ringfenced' green volume which isn't awarded in the green auction bucket would then be released back into the main CRM auction, ensuring there is no adequacy issues or requirement to run an additional auction. **The Flowchart in figure 5 provides an illustrative example of how this 'Green Auction' would work,** and the interlinkage with the conventional auction.

[2] Terms and Conditions ORESS Tonn Nua Offshore Wind Auction Ver.1.1

[3] Terms and Conditions for the Fifth Competition under the Renewable Electricity Support Scheme RESS 5

We acknowledge that the alternative proposal we have put forward is not yet fully refined or developed in terms of detailed design—just as the two options proposed by the SEMC in this consultation are not. **However, we consider the core concept to be robust and worthy of serious consideration.** In particular, the proposal for a separate, linked auction with a ring-fenced volume for green capacity, distinct green qualification criteria, a separate Green Auction Price Cap, and longer contract durations represents a strong framework for incentivising green investment.

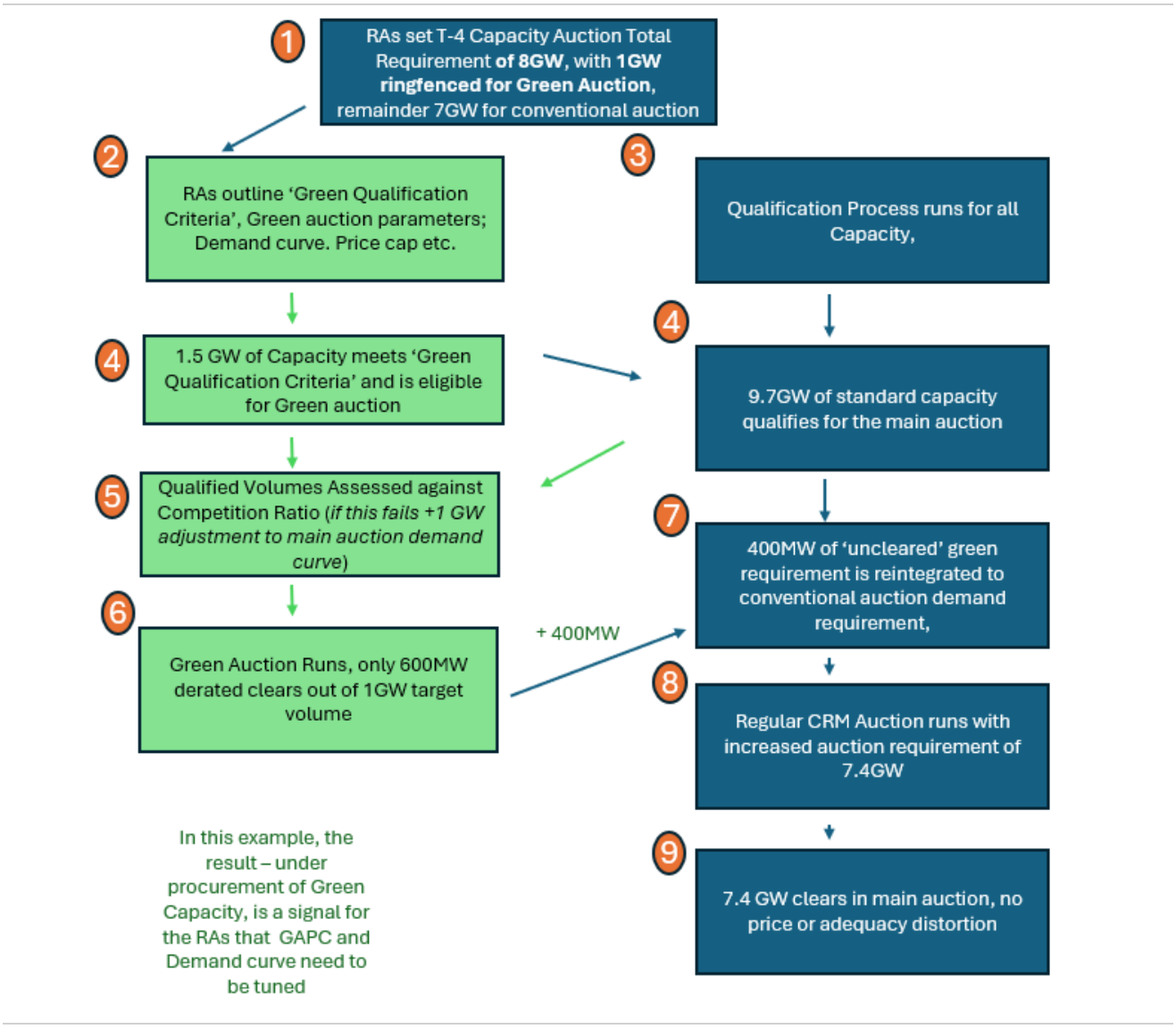

Figure 5: Illustrative Flowchart of how 'Linked Green Capacity Auction' would work in combination with main auction

Key benefits of the proposed linked Green Capacity Auction:

1. **Maintains Capacity Adequacy:** This proposal ensures that in the event of insufficient competition, or lower clearing volumes, the main auction demand curve is adjusted to ensure the total capacity requirement is met.

2. **Avoids Market Distortion:** Ringfenced nature would allow the RAs to effectively tune the decarbonisation signal in terms of volume and a price signal, and glidepath without distortion of the main capacity market. The ringfenced nature would allow the use of a 'Green Auction Price Cap', and ability to spread higher cost green capacity over a longer contract duration allowing more optimal allocation of cost.

3. **Cost Certainty**: By using a ringfencing approach, the RAs can set limits on the Green Auction volume requirement, price cap and demand curve. There is no risk of unintended consequences impacting auction dynamics in contrast to proposals outlined in the consultation.

4. **Efficient Cost Allocation:** For the Green Auction it makes sense to offer longer contract durations on the basis there is no risk of 'Fossil fuel lock in'. Aligning the contract duration with asset lifetime as is the case in ORESS, offers more revenue certainty for asset owners, resulting in lower bids and better value for consumers who will have a lower annual cost and longer adequacy contribution compared with the current 10-year contract duration.

5. **Maintains Technology Neutrality:** Objective RA determined 'Green qualification criteria' would ensure any capacity that qualifies for the Green auction participates on a level playing field, while the standard capacity auction is not negatively impacted and also remains technology neutral.

6. **Green Eligibility Criteria:** RAs can tune the 'Green qualification criteria' to ensure the auction procures the technology that best aligns with the system needs. This would avoid the risks that exists with the proposed simple emission threshold, of providing a windfall to units that are already viable as is.

In summary, BGE would like to reiterate our high-level message – **We are supportive of the principle of this Consultation and are firmly aligned with the RAs desire to reduce emissions in the existing CRM**. **However, our view is neither of the proposed options are a panacea and are instead likely to increase costs without delivering any material reduction in emissions.** The proposals are very high level, and the absence of indicative parameters makes it unclear exactly what kind of technology the regulator is aiming to incentivise. Having modelled the expected impacts for a range of possible emissions thresholds and scalar shapes, we are confident they will increase CRM costs without incentivising a behavioural change which materially reduces emissions.

We have outlined our view on the best alternative - namely the addition of a 'Linked Green Capacity Auction'- which ringfences a portion of the total capacity auction requirement for capaicty that meets RA determined green eligibility criteria, allowing the RAs to control the cost of the green capacity procurement without distorting the price for the wider market. While this is a nascent proposal and our thinking is still evolving, **BGE believes that our alternative proposal of a Linked Green Auction merits strong consideration as a viable way forward.** We would welcome a discussion with the RAs prior to further decisions being made on this critical topic.

If you wish to discuss any of the consultation response in further detail, please do not hesitate to contact me.

Yours sincerely,

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{By Email}