

APPENDIX D – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	Bord Gáis Energy (BGE)
Type of Stakeholder	Generator (all-island wholesale electricity market); Supplier (Irish retail electricity market)
Contact name (for any queries)	Eoin McGurk
Contact Email Address	eoinmcgurk@bordgais.ie
Contact Telephone Number	

CAPACITY MARKET CODE MODIFICATIONS CONSULTATION COMMENTS:

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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
<p>CMC_05_20_v2 Modification to Implement amendments as required by the Clean Energy Package Regulation EU 2019/943</p>	<p>In general, BGE supports the proposed modification’s aim given that it is of the utmost importance that the SEM’s CRM rules are compliant with the Energy Regulation (EU 2019/943).</p> <p>We are of the view that it is critical that new and existing capacity is very clear with respect to the implementation of emissions limits and how the relevant calculation methodologies apply to them and when.</p> <p>In this regard, we note and welcome that the RAs’ “High Level Technical Guidance” goes some way towards alleviating some of the concerns raised on the Capacity Market Code WG12 conference call, e.g. the approach to discrete demand sites and clarification for CHP units. We also note however that the timings of when the respective methodologies and requirements (across the ACER and the RAs’ Technical Guidance) apply to new and existing units, respectively, could be clearer. We understand that for existing units the requirements apply for the January 2021 auction and thus the July 2020 qualification window but believe that this timing, and separately the timing for the applicability of requirements to new units, could have been set out more clearly, and much earlier, by the RAs.</p> <p>Finally, the change in status from “standard” to “urgent” was not expected nor was it mentioned on the WG12 conference call. We would welcome more advanced notice of the status of “urgent” modifications or an indication wherever possible of such, in related WG meetings. Indeed, more time than has been given to review relevant documents is necessary going forward– the time given here to review Appendix C High Level Technical Guidance has been extremely limited.</p>	<p>BGE are not aware of any impacts from the proposed modification that are not already identified aside from the fact that the time given to review the Appendix C – High Level Technical Guidance has been unnecessarily limited particularly from an existing generator perspective.</p>	<p>BGE is content with the current drafting.</p>