

SEMC CMC MODIFICATION CONSULTATIONS

CMC 09_20 and 09_19, 07_20
and 07_20

Introduction

SSE welcomes the opportunity to respond to CMC modification proposals through public consultation. We have decided to respond to both consultations considering CMC_07_20, CMC_08_20 and CMC_09_19, as well as the separate consultation considering CMC_09_20, together. For the avoidance of doubt, this is a non-confidential response.

SSE is an active participant in the Capacity Market process and considers that these specific modifications imply the changing nature of the process as well as provide much needed closure of Day 2 type issues that were intended to be implemented swiftly following go-live of the new SEM.

It is our view that the modifications process requires the ability for sub groups to be developed to discuss and better develop modifications ahead of consultation of these proposals. In several cases, modifications have been rejected because of lack of justification or rationale, which is correct; but could have been developed and assessed through separate working groups beforehand. Both modifications proposed for rejection (07_20 and 08_20), and previous similar modifications (04_20)¹, could perhaps have benefitted from further and fuller development “offline”, before consideration through public consultation.

SSE Response

- SSE agrees with the assessment of the SEMC CMC_07_20 – Change in Technology Class for Awarded New Capacity and CMC_08_20 – Change of Awarded Existing Capacity to Awarded New Capacity. We agree that there was insufficient evidence as to why these mods were needed and how they would work—so we would agree they should be rejected.
- Regarding CMC_09_19 regarding interim secondary trading. We are disappointed with the length of time it has taken for this functionality to be provided in the market, where this was a design requirement from go-live. We are supportive of this functionality being provided as soon as possible.
- Finally, regarding CMC_09_20 – Modification to the Long Stop Date for the CY2020/21 T-1 Capacity Auction. We are supportive of the RAs position to provide an extension for a limited period. We note that the SEMC is requesting responses relating to whether the extension to the Long Stop Date is automatic or requiring some evidence to support the request for extension. We would be supportive of the modification applying some contingency, i.e. a letter from the project to confirm the need for the extension is directly related to the extenuating circumstances relating to Covid-19 and providing some detail as to what has been affected exactly.

¹ In our response to the modification consultation considering CMC_04_20 we recommended this needed to be brought back to the workshop for development. This has not occurred to date and we consider it is partly because of the current framework for CMC modifications, which is less formal and does not appear to have a tradition for subgroups and mod development.