

ESB GT RESPONSE TO SEM-20-056

SUMMARY INFORMATION

Respondent's Name	ESB Generation and Trading
Type of Stakeholder	Generator
Contact name (for any queries)	Paraic Higgins
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Contact Telephone Number	01 7027119

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_20 - Change to determinations made in F.4.1.1 (Version 2)	ESB Generation and Trading (ESB GT) agrees that the proposed modification improves the efficiency of the Capacity Market Code in relation to the transfer of information between the RAs and the TSO. As suggested in the working group ESB GT believes the inclusion of the additional information (previously Awarded Capacity) in the Initial/Final Auction Information Pack facilitate the efficient operation of the participants as well. If this isn't to be	No additional impacts have been identified.	In order to provide participants with the information in an easily acceptable format, ESB GT suggests the following changes to the legal drafting; <i>D.3.1.2(e) at the date of the Initial Auction Information Pack, how much Awarded Capacity has already been procured for the relevant Capacity Year and per Locational Capacity Constraint Area;</i>

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	included in this modification could the reason(s) please be provided.		
<p>CMC_11_20</p> <ul style="list-style-type: none"> - Providing greater flexibility for the current Interim Secondary Trading Notification (ISTN) process (Version 2) 	<p>ESB GT agrees that the proposed modification does further the CMC code objects (b) and (g) as it will improve the flexibility for generators to mitigate risk and also reduces the possibility of a hole in the hedge for the customer.</p>	<p>ESB GT would like to clarify comments made in the working group as per point 2.2.22 of the consultation paper. ESB GT did state that it would seem sensible to tie this proposal in with CMC_09_19 but also stated that this should only be on the basis that it did not impact the delivery of CMC_09_19.</p> <p>An impact assessment would need to be performed to determine if there are any implications from combining CMC_11_20 and CMC_09_19. As stated in Working Group 14, ESB GT would not support combining the IT fixes required for both modifications if there is any delay to CMC_09_19.</p>	<p>ESB GT suggests a change to the legal drafting to provide more clarity to the requirements for an ISTN;</p> <p>M.7.2.6(d)the quantity of the notional Secondary Trade (Capacity Quantity) is the greater of:</p> <p>(i) the change in the Net Capacity Quantity sought per day of the outage period (being the value specified under paragraph M.7.2.2(d) in the applicable Interim Secondary Trade Notification and noting that multiple values can be specified); and</p>

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		<p>Point 2.2.19 of the consultation period states <i>“the SOs advised that if a unit were to return early this is deemed the end of the planned outage”</i>. Could clarity be provided that this is the case to apply to the possible end of an ISTN?</p>	

NB please add extra rows as needed.