



## Response: Capacity Market Code Modification Proposals (SEM-18-034)

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With reference to consultation document issued by SEM Committee SEM-18-034 published 2/7/18  
and available at <https://www.semcommittee.com/publication/sem-018-034-i-sem-capacity-market-code-modifications-consultation> ]*

### About Grange Energy Centre

*Grange Energy Centre (GEC) is a planned 96 MW fast flexible power plant located within Grange Castle Business Park in South County Dublin. GEC is a potential new generation capacity provider. The legal entity of Grange Energy Centre is Grange Backup Power Ltd.*

## 1 Response

Grange Energy Centre (GEC) welcomes the opportunity of making a submission to the SEM Committee on this Consultation Paper (SEM-18-034).

Our concerns are in relation to the proposed CMC\_03\_18 – Qualification requirements in Respect of New Capacity.

We note that this modification proposal was withdrawn in advance of the consultation paper publication and that feedback is not specifically requested, but we wish to reiterate our concerns here as a matter of record.

The proposal tabled was to not make generator connection offers a prerequisite for qualification in capacity market auctions.

Our feedback was that this proposal would introduce an inconsistency between the requirements for renewable generation and other new capacity and this approach had not taken into account the CRU's Enduring Connection Policy-Stage 1 (ECP-1) see publication CRU18/058.

The approach would not be equitable to renewable energy generators, who are required to have grid connection offers in place prior to their request for participation in any market mechanisms, such as the upcoming RESS (Renewable Energy Support Scheme) and historically under REFIT contracts.

For many generators, the grid connection now forms an integral part of the planning and environmental impact assessment. The planning context has changed following recent court decisions, and planning consent should now cover the grid connection (See O'Grianna High Court case regarding Derragh Wind farm and the assessment of grid connections:

<http://www.courts.ie/Judgments.nsf/09859e7a3f34669680256ef3004a27de/4531402e2fb661ac802580ad0043feb6?OpenDocument> ).

It is worth noting that the initial planning application for this wind farm development was lodged with Cork County Council on the 8th of June 2012 and has therefore been undergoing the planning consent process and judicial review procedures for in excess of four and a half years.

It is also worth noting that unless the planning consent is unappealable, it has limited practical meaning.

To not make grid connection offer a mandatory prerequisite risks unacceptable implementation risk to the TSOs and the consumer in subsequently delivering on capacity reliability options.