

## APPENDIX D – RESPONSE TEMPLATE

### SUMMARY INFORMATION

|                                       |  |
|---------------------------------------|--|
| <b>Respondent's Name</b>              | ESB GWM  |
| <b>Type of Stakeholder</b>            | Generator  |
| <b>Contact name (for any queries)</b> | Paraic Higgins   |
| <b>Contact Email Address</b>          | <a href="mailto:Paraic.higgins@esb.ie">Paraic.higgins@esb.ie</a> |
| <b>Contact Telephone Number</b>       | 01 7027119   |

### CAPACITY MARKET CODE MODIFICATIONS CONSULTATION COMMENTS:

| <b>ID</b>   | <b>Proposed Modification and its Consistency with the Code Objectives</b>      | <b>Impacts Not Identified in the Modification Proposal Form</b> | <b>Detailed CMC Drafting Proposed to Deliver the Modification</b> |
|---|--|---|---|
| <b>CMC_01_18</b><br>– NIROCS in the CRM                       | N/A  | N/A   | N/A   |
| <b>CMC_02_18</b><br>– Permitted Disclosures – Credit Agencies | ESB agree with this modification and its consistency with the code objectives. | N/A   | N/A   |
| <b>CMC_04_18</b><br>– Capacity Auction Participation          | N/A  | N/A   | N/A   |

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| <p><b>CMC_05_18</b><br/>         – Combining Candidate Units into a Capacity Market Unit</p> | <p>ESB GWM would like to respond to the feedback from the working group in relation to CMC_05_18.</p> <p>If the SEMC are minded to consult on a basic principle for addressing share costs, ESB GWM are willing to provide comment on such a modification. However, in the absence of a such a modification, ESB GWM believes the proposed mod CMC_05_18 is required to ensure the short and long term interests of consumers of electricity and security of supply of electricity across the island of Ireland. Thus this modification must be taken in the context of its proposal and not in light of any broader application.</p> <p>In regards to the concerns about the basis on which the RAs would approve or reject an application, the possibilities of “site” and “significant shared generating assets” are potential preliminary conditions but should not be limited to just these potential conditions.</p> | <p>N/A</p> | <p>N/A</p> |
|--|--|------------|------------|

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|  | <p>If the RA s wanted to use “site” and “significant shared generating assets” as conditions, considering the CMC unit qualification is tied to the BM registration, the definition of site could be classified as the “Trading Site Name” for generators’ BM registration data.</p> <p>The definition of a “significant shared asset” could be classified as electricity generation equipment that is shared across a number of capacity market units and is integral to generating output of the site.</p> |  |  |
| <p><b>CMC_06_18</b><br/>– Disaggregation of Performance Securities to Capacity Market Unit</p> | <p>N/A</p>   | <p>N/A</p>   | <p>N/A</p>   |

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| <b>CMC_07_18</b><br>– Information Published Following a Capacity Auction | ESB GWM would support the 3 WD period between notification of results to participants and to the wider market.<br><br>ESB GWM do not understand the logic provided as to why 3 WD is not possible. | N/A  | The wording in the revised proposed modification appears to say that the auction results will be published 1.5 weeks before the auction is held. |
| <b>CMC_08_18</b><br>– Typographical Correction – E.8.2.4                 | N/A  | N/A  | N/A  |
| <b>CMC_09_18</b><br>– Publication of Qualification Results               | N/A  | N/A  | N/A  |
| <b>CMC_10_18</b><br>– Report on Capacity Auction                         | N/A  | N/A  | N/A  |

|   |   |
|---|---|
| <b>Respondent Comments in relation to the CMC Modifications process</b> | ESB GWM would like to wait to comment on the CMC modification process until the first modification process has been complete. |
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NB please add extra rows as needed.