

APPENDIX C – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	ESB GT
Type of Stakeholder	Generator
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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
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<p>CMC_14_18 – LCC MW Limits</p>	<p>ESB GT does not believe the current drafting of the proposed modification is consistent with the Code Objectives (no clarity on the methodology provided). The unintended consequences/impacts of the provision of adequate future capacity in a financially secure manner (objective b) and the promotion of the short-term and long-term interests of consumers of electricity with respect to price , quality, reliability, and security of supply of electricity across the Island of Ireland (objective g) have not been assessed in this modifications.</p> <p>ESB does not believe this current modification achieves objectives (d) when trying to promote competition in the provision of electricity capacity to the SEM and (e) to provide transparency in the operation of the SEM.</p> <p>Considering all of the above and issues raised in the workshop (points 2.2.8 and 2.2.9 of the consultation), the response provided that <i>“the RAs</i></p>	<p>The proposed modification has failed to identify the impact to the T&SC in relation to qCREQAR (F.18.2.1). Will a modification be required to allow for different values per unit or will this be an island value regardless of the approach applied?</p> <p>The impact section did not refer to the potential interaction with the recent CRU information note <i>“Dublin Security of Supply: Measures to mitigate the risk of disorderly exit”</i> (CRU/18/228). The implications of a change to TSO derived capacity requirement in the T-1 auctions and existing LRSA contracts should have been provided.</p>	<p>Add F.4.1.8A</p> <p>The Regulatory Authorities may, by written notice to the System Operators, set the Locational Capacity Constraint Required Quantity for one or more specified Locational Capacity Constraints in one or more Capacity Auctions to a value other than that proposed by the System Operators under paragraph F.4.1.5, as modified in accordance with paragraph F.4.1.6 and subject to the pre-determined methodology, and shall in the notice give reasons.</p>
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advised that interactions with the SO would take place in regards to understanding the SO LCC MW Limit process to ensure that any RA amendments that may be required are appropriate” is not appropriate and does not meet the code objectives.

This modification, as it stands with no clarity to the methodology, leaves participants unsure of how the Capacity Requirement can change from Auction to Auction. This regulatory uncertainty is not conducive to incentivising investment.

ESB believes a reworded modification or commitment that clearly identifies that the RAs will follow a process, as consulted upon, to ensure clarity and transparency to market participants, is required. Considering the significant process that was applied through the CRM consultation period to determine a transparent TSO methodology for calculating the capacity requirement, this opaque modification is a considerable step

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	backwards in terms of clarity, transparency and ensuring conditions for competition.		

NB please add extra rows as needed.