

## APPENDIX C – RESPONSE TEMPLATE

### SUMMARY INFORMATION

<b>Respondent's Name</b>	Energia
<b>Type of Stakeholder</b>	Generator
<b>Contact name (for any queries)</b>	Sean McParland
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<b>Contact Telephone Number</b>	028 90685993

### 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>
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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
<p><b>CMC_14_18</b> – LCC MW Limits</p>	<p>Energia are supportive of the Modification Proposal and note that it is in line with the code objectives given the rationale to allow the RAs’ flexibility to amend the Locational Capacity Constraint (“LCC”) MW limit is consistent with their ability to do so on an all-island basis.</p> <p>We are of the view that this modification will also provide the necessary flexibility to help manage and deal with any potential security of supply concerns that may arise in LCCAs in the future, given the recent publications by both CRU and EirGrid (e.g. CRU/18/228 Information Paper on Dublin Security of Supply and CRU/18/229a Letter to EirGrid supporting participation of New Capacity in the Dublin area in the T-4 CY2022/23 Capacity Auction without a prior grid connection offer).</p> <p>However we would stress that whilst we are supportive of this proposal to provide the RAs with the ability to modify the LCC MW limits in the context of the clear requirements in the Dublin area, we would not be supportive of the proposal for the purpose of withholding capacity from the T-4 auction. We have outlined our rationale in objecting to this in our response to Consultation SEM-18-028 and it should be noted that our support of the proposal is conditional upon this.</p> <p>Furthermore we would also note the Consultation Paper SEM-18-162 regarding this proposal addresses the issue of</p>	<p>Energia are not aware of any impacts in the Modification Proposal Form which have not been identified.</p>	<p>Energia are satisfied that the drafting to be included in the CMC to deliver the Modification is accurate and will implement the Modification as intended.</p> <p>However as already noted we believe an additional clause needs to be included in the CMC outlining the timings of publication of information should the RAs make any changes to LCC MW limits.</p>

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	<p>transparency around how any changes would be made by the RAs to SO figures. The paper states in paragraph 2.2.10 that <i>“consideration would be given to the publication of the necessary information in regards to any amendments to the LCC MW limits”</i>. We believe that the information behind any changes made by the RAs should be published to support transparency regarding this and that the process for doing so (i.e. timings of publications etc.) should be codified to provide clarity and certainty for participants.</p>		
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NB please add extra rows as needed.