

ESBGT'S RESPONSE TO SEM-20-043

SUMMARY INFORMATION

Respondent's Name	ESB Generation and Trading
Type of Stakeholder	Generator
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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_09_20 - Modification to the Long Stop Date for the CY2020/21 T-1 Capacity Auction	<p>ESB Generation and Trading (ESB GT) agrees that the proposed modification is consistent with the CMC specifically objectives (b) and (c).</p> <p>Considering the potentially high administrative burden (for affected Participants and the System Operators) associated with managing individual claims for relief under the CMC Force Majeure provisions, the flexibility provided through this modification is a proportionate</p>	<p>In point 2.1.48 of the consultation paper the RAs ask the question as to whether the extension should be contingent on provision of some degree of evidence to the RAs. This could be as simple as a letter from the participant confirming the reason for the delay and requesting the extension. Considering the incentive of new capacity to deliver still remains, ESB GT is of the view</p>	<p>ESB GT believes the RAs proposed extension of the Long Stop Date to 18th December 2020, for capacity with a single year award, is a pragmatic approach to balance the competing concerns of the TSOs and potential affected market participants.</p> <p>As stated earlier, ESB GT believes the extension provided to December is a useful modification, however, ESB GT believes the</p>

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	<p>approach to assist affected market participants balance the risk impact of capacity commissioning delays caused by restrictions implemented in response to Covid-19.</p>	<p>that an extension to all participants would be more transparent and create the least administrative burden on participants, RAs and TSOs.</p> <p>Whether big or small the size of the effected unit(s) can have an impact on the Capacity Market. For example, if the effected 63.2MW was missing during an ASP event it could increase the Partial ASP by €298/MWh. However considering the impact the 63.2MW could have on the BM price, the fact that there cannot be a re-auction, and the delays to meeting completion deadlines are out of control of the affected participants, ESB GT supports the modification with the RAs proposed change of the 18th of December.</p>	<p>additional RA approval exemption process proposed in M.11.2 of the modification is unnecessary. The addition introduces ambiguity as to the real long stop date. ESB GT suggests the removal of “or such later date as may be determined by the Regulatory Authorities, due to restrictions implemented in response to Covid-19, and notified to the System Operators.”</p>

NB please add extra rows as needed.