

Date: 24/07/2020

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Subject: Statkraft Response to CMC\_09\_20- Modification to the Long Stop Date for the CY2020/21 T-1 Capacity Auction- Consultation

**Sent via Email to:** Kevin.Lenaghan@uregni.gov.uk and Kevin.Baron@uregni.gov.uk

Dear Regulators,

We would like to thank you for the opportunity to respond to this consultation. Please find below our detailed response.

Yours sincerely,

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**Bernice Doyle**

Grid Manager, Grid Services Team  
European Wind and Solar, ENIG – Grid & DS3

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For and on behalf of Statkraft Ireland Limited

**SUMMARY INFORMATION**

<b>Respondent's Name</b>	Statkraft Ireland Limited
<b>Type of Stakeholder</b>	Battery Energy Storage System (Kilathmoy BESS)
<b>Contact name (for any queries)</b>	Bernice Doyle
<b>Contact Email Address</b>	Bernice.doyle@statkraft.com
<b>Contact Telephone Number</b>	086 179 4094

**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
<p><b>CMC_09_20</b></p> <ul style="list-style-type: none"> <li>- Modification to the Long Stop Date for the CY2020/21 T-1 Capacity Auction</li> </ul>	<p>The CMC already has allowances for Force Majeure situations such as the Covid-19 pandemic built in to the code. We agree with DRAI that, while the Force Majeure provisions of the CMC would cover this situation, this would require individual Participants to claim relief separately (likely to be a significant administrative burden for both the Participants and the System Operators) and the complexity of the mechanics of how this would actually be applied would be very difficult to manage. Therefore, this approach is more pragmatic in this circumstance.</p>	<p>We agree with the DRAI in their proposal that this modification “Helps to manage the delivery risk on new capacity providers without materially impacting security of supply or the value of the CRM hedge to consumers”</p> <p>We wish to support the very real risk to capacity delivery caused by Covid-19. Our Kilathmoy BESS project is very unlikely to achieve Substantial or Minimum Completion by the current long-stop due to restrictions in site access in 2020 as a result of the Covid-19 pandemic. This delayed completion of commissioning and testing and subsequent grid code compliance testing with EirGrid.</p>	<p>We have no comments on the drafting of the modification. We support the extension proposed though, like the DRAI we would prefer to see the Long Stop Date extended to January 20th 2021</p>