



Re: CEWEP Ireland response to Capacity Market Code Working Group 19 Modification Consultation Paper SEM-21-055, Ex-post Verification of Compliance with the CO₂ Limits, CMC_08_21

By email to Kevin.Lenaghan@uregni.gov.uk

CEWEP Ireland welcomes the opportunity to respond to this consultation on CMC working group 19. Our comments relate to section 2.4, *Ex-post Verification of Compliance with the CO₂ Limits (CMC_08_21)*.

1. Ex-post verification of emissions data

There are existing procedures and processes in place for reporting and verifying emissions. In order to minimise the administrative burden for reporting these emissions, it makes sense to use one reporting mechanism (i.e. combine the two CO₂ reporting requirements into the same mechanism).

2. Timeframe to submit data

CMC_08_21 proposes the emissions should be reported after the Capacity Year is over and be submitted within three months of the end of the Capacity Year, i.e. by the end of December. While we are not disputing the proposed timeframe, it should correlate with existing reporting timelines in order to streamline reporting.

3. Conclusion

CEWEP Ireland supports this proposed modification as it aligns the CRM with the ex-post validation recommendations in ACER Option 22 /2019 on the calculation of CO₂ limits. Combining the existing CO₂ reporting requirements into the same mechanism would assist in streamlining reporting procedures.