Bord na Mona Response to SEM-21-023

In response to the above we wish to make the following points.

Mod CMC_11_21 – Extension of ASTN Arrangements (Version 2)

1. In regard to the SEMC minded to decision to include a 70-day limit on trades above de-rated capacity, it is unclear in terms of what this limit is seeking to achieve or prevent. We would specifically request an explanation of the supporting rationale, and cannot understand, on the basis of current information, why this limit would not be removed.   In any event, we note that the proposed limit is based on outdated data regarding outages (2014-2016) that precede the new market.

2. We note that the time period for which a Secondary Trade can be implemented is currently set at 5 Working Days after notification and that Modification proposal CMC_11_21 seeks to replace this by implementing a 2-hour notification period for activating a secondary trade. BnM, and industry have previously commented that the current 5 working day term is too long, and we recognise from the authorities' response that facilitation of this will require system changes. However, we also note the earlier proposal in relation to Mod_09_19 that an effective date and time for the trade could be introduced – i.e. when both parties to the trade submit identical 'trade details'. We believe that there is firm rationale for such a work-around to avoid delays dependent on the aforementioned system changes.

Mod CMC_08_21 – EX-POST VERIFICATION OF COMPLIANCE WITH THE CO2 LIMITS

We draw attention to the WG 18 Consultation itself:

'2.4.15 Energia had a general question relating to CO_2 emissions compliance and the Clean Energy package (CEP). They had a query as to whether there are provisions in the code that checks / monitors how many hours a unit may have run and has not breached a run hour limit.

2.4.16 The RAs advised that this is a good point and would be worth checking to ensure that this has been covered correctly and that a gap in this area has not been left open. '

We would welcome any further insight in relation to 2.4.16.