

APPENDIX E – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	Bord na Móna
Type of Stakeholder	Generator
Contact name (for any queries)	Justin Maguire
Contact Email Address	Justin.maguire@bnm.ie
Contact Telephone Number	086 2378864
Confidential Response	[N]

CAPACITY MARKET CODE MODIFICATIONS CONSULTATION COMMENTS:

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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
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<p>CMC_11_22</p> <ul style="list-style-type: none"> - De-rating for Annual Run Hours Limits 		<p>Point 1</p> <p>BnM’s understanding set out in paragraph 2.1.13 (italicised text) of SEM-22-055 CMC_11_22 Urgent Consultation WG26b is that previously awarded capacity secured within past Capacity Auctions includes those having a max capacity duration of up to 10 years.</p> <p>2.1.13 TEL requested clarification that this proposal, if implemented, would not have an impact on previously awarded capacity that has not yet been commissioned.</p> <p><i>The RAs advised that this proposal will not impact any previously awarded capacity secured within past Capacity Auctions. Further, the RAs stated that this proposal will follow the same principles of the CMC and that no retrospective action will be applied and any awarded capacity will continue to be measured against the De-rating factors that applied to the Auction in which capacity was secured.</i></p>
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		<p>Point 2 Notwithstanding the two references below it is not clear how a mix of existing and new capacity might be treated within the same CMU. We would welcome clarification on the same.</p> <p>Ref 1 Within the definition of New Capacity in the Modification: 'the incremental increase in the capacity of an existing Generator..... (which has yet to complete Commissioning under the relevant Grid Code)' – and also with regard to: 2.1.10 within the Consultation paper: <i>2.1.10 SSE queried whether this would participate as New Capacity, to which the RAs advised that once it has been commissioned it would cease to be New Capacity and would therefore be deemed Existing at the next auction.</i></p>	
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NB please add extra rows as needed.