

## APPENDIX E – RESPONSE TEMPLATE

### SUMMARY INFORMATION

|                                       |                      |
|---------------------------------------|----------------------|
| <b>Respondent's Name</b>              | Bord Gáis Energy     |
| <b>Type of Stakeholder</b>            | Generator            |
| <b>Contact name (for any queries)</b> | Eoghan Cudmore       |
| <b>Contact Email Address</b>          | ecudmore@bordgais.ie |
| <b>Contact Telephone Number</b>       | 0833965951           |
| <b>Confidential Response</b>          | N                    |

### CAPACITY MARKET CODE MODIFICATIONS CONSULTATION COMMENTS:

Bord Gáis Energy (BGE) welcomes the opportunity to respond to this SEM-22-051 consultation on the modification proposals that were initially discussed at the Capacity Market Code ('Code') Urgent Working Group 26B:

**CMC\_11\_22: De-rating for Annual Run Hours Limits:** BGE supports this modification. As things stand if large volumes of ARHL units qualify and aren't derated, they would undermine the capacity markets contribution to general system adequacy. Applying this de rating paints a more accurate picture of the unit's contribution to generation adequacy situation. Annual run hour limited de rating factor provides a clear signal to investors that the regulators are serious about the need to procure cleaner technologies. Ultimately this will benefit the consumer resulting in lower prices due to greater availability, and reduced carbon emissions.

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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 |
|---|--|--|--|
| <p><b>CMC_11_22</b></p> <ul style="list-style-type: none"> <li>- De-rating for Annual Run Hours Limits</li> </ul> | <p>BGE Supports the proposed modifications to the CMC, as these are in keeping with the primary objectives of the Capacity Market in Particular Section A 1.2.1</p> <ul style="list-style-type: none"> <li>(a) to facilitate the efficient, economic and coordinated operation, administration and development of the Capacity Market and the provision of adequate future capacity in a financially secure manner;</li> <li>(g) through the development of the Capacity Market, to promote the short-term and long-term interests of consumers of electricity with respect to price, quality, reliability, and security of supply of electricity across the Island of Ireland.</li> </ul> | <p>NA</p>  | <p>NA</p>  |

NB please add extra rows as needed.