

APPENDIX C – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	Bord Gáis Energy
Type of Stakeholder	Generator in the all-island single electricity market; supplier in the Irish retail market
Contact name (for any queries)	<i>Ian Mullins</i>
Contact Email Address	<i>imullins@bordgais.ie</i>
Contact Telephone Number	<i>087 7912963</i>
Confidential Response	N

Summary of Main Messages

Bord Gáis Energy (**BGE**) welcomes the opportunity to respond to this SEM-23-040 supplementary consultation on the CMC_03_23 modification proposal that was initially discussed at the Capacity Market Code ('Code') Working Group 29:

CMC_03_23: Amendment to Long Stop Date for T-1 Capacity Auction

BGE was not supportive of CMC_03_23 as originally drafted and presented at the Capacity Market Code Working Group 29 in January 2023 primarily because it did not in our view improve the delivery of awarded new capacity to the market and consumer but instead weakened the delivery incentive for units contracted under the short lead-in for delivery under T-1 capacity auctions to support the security of supply requirements over the peak winter period. We welcome the pragmatic and flexible approach to help facilitate the delivery of Awarded New Capacity when possible as offered by the SEM Committee in this supplementary consultation (SEM-23-040). **BGE supports the revised legal text proposed by the RAs in relation to CMC_03_23** which offers Awarded New Capacity from the CY2023/24 T-1 Capacity Auction with maximum 1-year contracts a pathway to apply for short extensions to their Longstop Date (LSD) on a case-by-case basis but we ask that a limit of 4 weeks is put on any such extensions to prevent delays running past the November stage. This will facilitate the delivery of new capacity to the market within the framework and requirements as agreed by industry and codified in the Capacity Market Code (CMC). The Regulatory Authorities need to

APPENDIX C – RESPONSE TEMPLATE

set the appropriate criteria on applications to ensure that only short-term extensions (with a limit of 4 weeks as set out above) are proposed. Applications should avoid extension requests that bring any changed delivery date into the busy December period.

We ask that any changes made under this proposed pathway are recorded in the Capacity and Trade Register as quickly as possible considering that there may only be a short period between the change being agreed and becoming effective. We propose that agreed changes are added to the Capacity and Trade Register within 24 hours of them being advised by the Regulatory Authorities and that such changes and updates to the Register are notified to industry on the day the update to the Register is made.

BGE would support a review of the proposed changes and to what extent they have been applied and effective after the delivery of all CY2023/24 T-1 capacity contracts to understand if the proposed pathway should be made enduring for all other T-1 auctions. Any enduring changes should be consulted on and agreed with industry before being implemented.

CAPACITY MARKET CODE MODIFICATIONS CONSULTATION COMMENTS:

APPENDIX C – RESPONSE TEMPLATE

ID	Proposed Legal Text and its Consistency with the Code Objectives	Impacts Not Identified in the proposed Legal Text	Detailed CMC Drafting Proposed to Deliver the Modification
<p>CMC_03_23: Amendment to Long Stop Date for T-1 Capacity Auction (Legal Text)</p>	<p>None</p>	<p>None</p>	<p>J.5.7.2 The application under paragraph J.5.7.1 shall include: (a)..... € a plan to rectify those issues, the tasks that need to be undertaken to meet the revised Long Stop Date; and (d) details of any impact on other Implementation Plan dates, with detailed reasoning, and (e) a maximum extension request of 4 weeks.</p> <p>J.5.7.4 Where the Regulatory Authorities accept a request under paragraph J.5.7.1, they shall advise the System Operators of the new Long Stop Date and any other changed Implementation Plan dates and the System Operators shall record those changes in the Capacity and Trade Register within 24 hours of receiving such advice and notify industry on the day of recording those changes.</p>

APPENDIX C – RESPONSE TEMPLATE

NB please add extra rows as needed.