

TYNAGH ENERGY
L I M I T E D

Karen Shiels
Utility Regulator
Queens House
14 Queens Street
Belfast
BT1 6ED

Kevin Lenaghan
Utility Regulator
Queens House
14 Queens Street
Belfast
BT1 6ED

Ref: TEL/JC/2020/076

20th April 2020

RE: Response to Capacity Market Code Modification Consultation Paper (SEM-20-023(C))

Dear Karen/Kevin,

Tynagh Energy Limited (TEL) welcomes the opportunity to respond to this CMC Modification Consultation Paper on Modification *CMC_05_20 Amendments Relating to the Clean Energy Package*

This response briefly outlines three areas of concern for TEL regarding this consultation. These are:

- Timeline of Consultation
- Treatment of secondary fuel capacity,
- Treatment of CHP units.

Timeline of Consultation

This consultation did not need to be raised as an urgent consultation as the key aspects of this consultation had been raised in Autumn of 2019, and the consultation could have been published shortly after. However, TEL appreciate that at this stage, the decision regarding the 23/24 auction is critical. As such, TEL suggest that the RA's consult again on the aspects of this consultation that are relevant for the 24/25 auction.

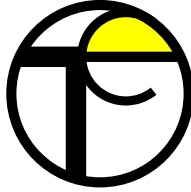
Treatment of Secondary Fuel

Point 5 in The High-Level Technical Guidance in Appendix C of this consultation briefly outlines the treatment of Secondary Fuel for the determination of CO₂ Emissions, pursuant to Article 22(4) of EU Regulation 2019/943. TEL would like to declare its support of the CO₂ Emissions determination methodology proposed by the RA's in light of secondary fuel. As specified in this consultation, TEL believe CO₂ emissions rates, when a unit's primary fuel is unavailable, should not be individually determined for both primary and secondary fuels but instead an average CO₂ emission rate over historic fuels is more appropriate. Furthermore, TEL believe that this methodology should also be applied across the whole unit including capacity that is only available on secondary fuel.

**Block A, The Crescent Building, Northwood Park, Santry
Dublin 9 D09 X8W3
IRELAND**
TEL: +353 (0) 1 857 8700
FAX: +353 (0) 1 857 8701

DIRECTORS
Jan Springl (CZ)
Tarloke Singh Bains
Bran Keogh (IRE)

REGISTERED NUMBER: 378735



Treatment of CHP Units

TEL welcome and support the clarification on the treatment of CHP units in the technical guidance document.

Should you have any queries, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Casley', written over a horizontal line.

John Casley
Commercial Strategy & Regulation Analyst