

## APPENDIX C – RESPONSE TEMPLATE

### SUMMARY INFORMATION

<b>Respondent's Name</b>	Energy Storage Ireland
<b>Type of Stakeholder</b>	Energy Storage Association
<b>Contact name (for any queries)</b>	Bobby Smith
<b>Contact Email Address</b>	info@energystorageireland.com
<b>Contact Telephone Number</b>	087 294 5958

### CAPACITY MARKET CODE MODIFICATIONS CONSULTATION COMMENTS:

<b>ID</b>	<b>Proposed Modification and its Consistency with the Code Objectives</b>	<b>Impacts Not Identified in the Modification Proposal Form</b>	<b>Detailed CMC Drafting Proposed to Deliver the Modification</b>
<b>CMC_09_19</b> - <b>Supplementary Interim Secondary Trading (Version 2)</b>			

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<p><b>CMC_07_20</b> - <b>Change in Technology Class for Awarded New Capacity</b></p>	<p>ESI supports this proposed modification, in particular, the modification aims to provide for situations where the participant delivers capacity that has a better derating factor without changing Technology Class. This is especially relevant for storage projects and we believe this flexibility should be allowed.</p> <p>A previous Modification, CMC_06_19, introduced additional flexibility to meet Awarded New Capacity obligations with a larger but shorter duration (lower derating factor) unit than those envisaged at qualification, within the same Technology Class. The CMC currently prevents a unit from being able to meet its Awarded New Capacity obligations with a smaller but longer duration (higher derating factor) unit than envisaged at qualification.</p> <p>Therefore, this mod would allow flexibility in both directions and remove the current restrictions on smaller but longer duration units. This is particularly relevant to storage and</p>		<p>Modified drafting to G.3.1.4A could be carried out to allow this flexibility within technology class</p>
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	<p>DSUs that might achieve a significant improvement in de-rating factor by extending their duration (Maximum Down Time / Maximum On Time). As ultimately the derating methodology ensures that 1 MW of de-rated capacity is of the same value to the system and to security of supply, independent of Technology Class, Maximum Down Time, etc it does not seem logical to only enable this flexibility in one direction.</p> <p>The RAs minded to position is to reject the mod as they cannot see the rationale for allowing changes in technology class but at a minimum the element of the mod in relation to changes within technology class, and allowing this two-way flexibility, is something that is reasonable and should be progressed.</p>		
<p><b>CMC_08_20</b>            - <b>Change of Awarded Existing Capacity to Awarded New Capacity</b></p>			

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NB please add extra rows as needed.