

Response to SEM-21-023
Capacity Market Code WG18 Consultation Paper
CMC_04_21

EirGrid and SONI Response
04/05/2021



1 Introduction

1.1 EirGrid and SONI

EirGrid holds licences as independent electricity Transmission System Operator (TSO) and Market Operator (MO) in the wholesale trading system in Ireland, and is the owner of the System Operator Northern Ireland (SONI Ltd), the licensed TSO and MO in Northern Ireland. The Single Electricity Market Operator (SEMO) is part of the EirGrid Group, and operates the Single Electricity Market on the island of Ireland.

Both EirGrid, and its subsidiary SONI, have been certified by the European Commission as independent TSOs, and are licenced as the transmission system and market operators, for Ireland and Northern Ireland respectively. EirGrid also owns and operates the East West Interconnector, while SONI acts as Interconnector Administrator for both of the interconnectors that connect the island of Ireland and GB.

EirGrid and SONI, both as TSOs and MOs, are committed to delivering high quality services to all customers, including generators, suppliers and consumers across the high voltage electricity system and via the efficient operation of the wholesale power market. EirGrid and SONI therefore have a keen interest in ensuring that the market design is workable, will facilitate security of supply and compliance with the duties mandated to us and will provide the optimum outcome for customers.

EirGrid and SONI have duties under licence to advise the CRU and UR respectively on matters relating to the current and expected future reliability of the electricity supply. We have also been allocated responsibility for administering the Capacity Market Code through our TSO licences. This response is on behalf of EirGrid and SONI in their roles as TSOs for Ireland and Northern Ireland.

2 EirGrid and SONI views on the Consultation Topic

EirGrid and SONI in our role as System Operators have considered the points raised during the Capacity Market Workshop 18¹ and in the SEM-21-023 consultation paper², in relation to CMC_04_21 ‘ *Verification Requirements for Implementation Plan Milestones*’³.

This modification proposal is recommended to remove the need to verify requirements of the CMC that do not apply to DSUs/ AGUs. Furthermore, it seeks to remove the obligation to provide in all circumstances an independent Certified Engineers certificate but retains the right for the System Operators to seek this if they deem it necessary.

If this modification proposal is not implemented, obligations would remain in the Capacity Market Code which are not applicable to DSUs and AGUs.

EirGrid and SONI support the intent of the proposed changes which will benefit the Code objectives by facilitating the efficient discharge by EirGrid and SONI of the obligations imposed by their respective Transmission System Operator Licences in relation to the Capacity Market. The proposed modification also proposes to facilitate the participation of undertakings including electricity undertakings engaged or seeking to be engaged in the provision of electricity capacity in the Capacity Market.

¹ <https://www.sem-o.com/events/capacity-market-modificat-28/Capacity-Modifications-Committee-Workshop-18-Report-2.0.pdf>

² <https://www.semcommittee.com/publications/sem-21-023-capacity-market-code-wg18-consultation-paper-and-accompanying-documents>

³ https://www.sem-o.com/documents/market-modifications/CMC_04_21/CMC_04_21-VerificationRequirementsforImplementationPlanMilestones.pdf