

APPENDIX C – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	ESB Generation & Trading
Type of Stakeholder	Generator
Contact name (for any queries)	Catherine McHale
Contact Email Address	catherine.mchale@esb.ie
Contact Telephone Number	086 8480966
Confidential Response	No

CAPACITY MARKET CODE MODIFICATIONS CONSULTATION COMMENTS:

APPENDIX C – RESPONSE TEMPLATE

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>CMC_05_21 - Substitution of Candidate Units</p>	<p>ESB Generation and Trading (ESB GT) agrees that the proposed modification facilitates CMC Objectives (b) (efficiency), (c) (facilitate participation) and (g) (promote short-term and long-term interests of consumers).</p> <p>ESB GT are in agreement with this modification as it will provide more options to new capacity market units therefore facilitating greater chances of project delivery to provide capacity and protecting customers interests.</p>	<p>No additional impacts have been identified.</p>	<p>ESB GT agrees with the minded to decision on this modification and the proposed drafting.</p>

APPENDIX C – RESPONSE TEMPLATE

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>CMC_06_21</p> <ul style="list-style-type: none"> - NIRO and the CRM: Compliance with State aid approval 	<p>ESB GT are in agreement with the principals behind this modification in prohibiting participation by any CMU, or element of a CMU, in receipt of NIRO payments. This aligns with recital 35 of the State Aid decision.</p>	<p>In line with B.12.15 (No Retrospective Effect), ESB GT does not agree with applying a retrospective change to participants and has concerns about any unintended consequences and the precedent that such a retrospective change may set.</p>	<p>ESB GT does not agree with the addition of I.1.2.1 (d) to the code and believe that the addition of E.7.4.3(a) is sufficient for participants to comply with the code for any future auctions.</p> <p>Add (d) to I.1.2.1 (d) for each Imbalance Settlement Period within the Capacity Year the Capacity Market Unit meets all the requirements of this Code to be a Capacity Market Unit.</p> <p>ESB GT also believe that section B.8.1.1 of the CMC clearly defines the obligations of participants to comply with the code at all times making the inclusion of I.1.2.1(d) an unnecessary and confusing addition.</p>

APPENDIX C – RESPONSE TEMPLATE

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>CMC_07_21</p> <ul style="list-style-type: none"> - Reduced Applications for Qualification 	<p>ESB GT agrees that the proposed modification facilitates CMC Objectives (a) (meet obligations), (b) (efficiency) and (c) (facilitate participation).</p> <p>ESB GT recognises that the modification proposed is aiming to remove the burdensome and unnecessary administrative aspects of the qualification process. However, ESB GT is of the opinion that if a unit already has a contract for a capacity year, be that as an existing or new participant, then no application needs to be made for those units for an auction relating to that capacity year. This would align to similar capacity processes (e.g. GB Capacity Market qualification process).</p> <p>As suggested in the working group ESB GT seeks further detail and clarity on the form the 'Reduced Application for Qualification' will take.</p>	<p>ESB GT are concerned that resulting in this mod there would be an additional option for applications for qualification of units and that this would add unnecessary confusion to the qualification process. ESB GT are of the opinion that duplication of applications is unnecessary for contracted units and that even a reduced application is unnecessary.</p> <p>ESB GT asks for details of the format for the 'Reduced Application for Qualification' to ensure there are no un-identified impacts or unnecessary confusion for participants when submitting units for qualification.</p>	<p>ESB GT request that the format for the 'Reduced Application for Qualification' to be included part of the appendix in the final decision for this Mod so full details of the changes are available to market participants.</p>

APPENDIX C – RESPONSE TEMPLATE

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>CMC_08_21</p> <ul style="list-style-type: none"> - Ex-post Verification of Compliance with the CO₂ Limits 	<p>ESB GT agrees that the proposed modification facilitates CMC Objectives (e) (facilitate development of CM and provision of future capacity), (f) (facilitate participation) and (g) (promote short-term and long-term interests of consumers). ESB GT are in favour of compliance with emissions requirements and the objectives of the pathway to net zero. However, we believe that further information on this modification should be provided to participants to fully understand the obligations placed upon them and consider the proposal while in position of the appropriate impacting information.</p>	<p>The impacts or penalties of any potential non-compliance with this modification and the resulting penalties are not identified in the modification proposal.</p>	<p>ESB GT call for more information to be provided to participants to fully understand the application of obligations and potential penalties resulting from this modification before it could be approved.</p>
<p>CMC_09_21</p> <ul style="list-style-type: none"> - Addition of time for RAs consideration of SFC Extension Request 	<p>ESB GT believe that this modification is a reasonable request from the RAs to allow proper consideration for SFC extension requests and are in favour of its approval and aligns with CMC objective A.1.2.1(b) enabling efficient operation of the Capacity Market.</p>	<p>No additional impacts have been identified.</p>	<p>ESB GT agree with the minded to decision on this modification and are happy with the proposed drafting.</p>

APPENDIX C – RESPONSE TEMPLATE

<p>CMC_10_21</p> <ul style="list-style-type: none"> - Modification to the provisions for Market Registration of Demand Side Units 	<p>ESB GT are unsure if this proposed modification facilitates the improvement of any of the CMC objectives. This modification, similar to CMC_06_20, appears to be changing the CMC due to issues with the DS3 market and is more about improving the finances of DSUs/AGUs in the DS3 market while minimising their exposure in the Capacity Market. Outside of the facilitating the objectives of the CMC, ESB GT has concerns that this proposal would provide DSUs/Aggregators with additional benefits and flexibility in the CRM that are not currently available to other technology types. This treatment could be viewed as preferential so that certain units can obtain better market benefits and therefore comparatively discriminatory for other market participants.</p>	<p>ESB GT are of the opinion that further consideration of the proposals in this mod is required. It is unclear how the mod will interact with other similar mods currently being proposed with the potential for unintentional impacts on the market.</p> <p>As mentioned, ESB GT are aware that there are a number of similar proposals currently being put forward on similar topics in both the TSC (Mod_08_21) & Grid Code. This is causing confusion among participants and we believe there would be benefit to all if a project was undertaken by the Regulatory Authorities to address all of these requested changes in one workstream. This approach will enable participants to carefully consider any impacts together on the topic and provide greater clarity on the combined requests for DSUs.</p>	<p>ESB GT understands the issues involved and reasons for these change requests however before supporting this modification we recommend a more holistic approach be taken.</p>
---	--	---	---

APPENDIX C – RESPONSE TEMPLATE

<p>CMC_11_21</p> <ul style="list-style-type: none"> - Extension of ASTN Arrangements Version 2 	<p>ESB GT agrees that the proposed modification facilitates CMC Objectives (d) (promote competition) and (g) (promote short-term and long-term interests of consumers). This modification also progresses the requests of SEM-20-064, where “a commitment be given to when the ability to trade above the de-rated capacity will be possible, and that such date should not be after 1st October 2021.”</p> <p>Further to this in section 2.3.15 of SEM-20-064 stated that, “The CRM Team will continue to engage with the SOs to develop the systems necessary to extending the scope of the Alternative Secondary Trading Arrangements to allow trading above de-rated capacity.”</p> <p>ESB GT are supportive of the reduction of the trade notification period, it has been proposed as 2 hours. However, ESB GT believes that a reduction to 1 day would be a sufficient reduction to increase flexibility and provide a more</p>	<p>ESB GT requests that the RAs review the appropriateness of the 70 day limit on trading de-rated capacity with a view to aligning it with more recent market conditions. This will have a commercial benefit to the market and ensure the best available value is available to participants.</p>	<p>ESB GT agree with the minded to decision on this modification and are happy with the proposed drafting.</p>
--	--	--	--

APPENDIX C – RESPONSE TEMPLATE

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>workable interim solution for the SOs to manage during any required systems upgrades for the 2 hour process. This alteration is justified in gaining full assistance of the market in facilitating short notice outage movements. This increased flexibility allows market participants to deliver on their CRM obligations while providing increased flexibility to the SOs.</p>		

NB please add extra rows as needed.