

APPENDIX E – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	Bord na Móna
Type of Stakeholder	Generator
Contact name (for any queries)	Justin Maguire
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Contact Telephone Number	086 2378864
Confidential Response	[N]

CAPACITY MARKET CODE MODIFICATIONS CONSULTATION COMMENTS:

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
CMC_04_22 - New Reference Rates for Default Interest			
CMC_06_22 - New Independent Combined Units			

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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
CMC_07_22 - Joint Market Registration Variation in Mix			

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<p>CMC_08_22</p> <ul style="list-style-type: none"> - Local Capacity Constraints Maximum Quantities 	<p>While we understand and empathise with the issue facing the System Operators, and Regulatory Authorities, we do not believe that the Proposed Modification is consistent with the Capacity Code Objective: A. 1.2.1 e) to provide transparency in the operation of SEM</p>	<p>Lack of transparency can, albeit unintentionally, lead to perverse outcomes. The lack of transparency referred to is on account of an absence of any presented methodology on which to base <u>maxima</u> values, principally the Locational Capacity Constraint Maximum Quantities.</p> <p>While the Mod refers to the approved Locational Capacity Constraints methodology (SEM-17-040), which is a very detailed and carefully explained process, designed to establish <u>minimum</u> locational constraint volumes, it acknowledges that: 'Changes may be required to this methodology to provide for this change and these would need to follow the appropriate process as this methodology does not form part of the Capacity Market Code.' We believe that a detailed methodology needs to be proposed, understood and</p>	<p>We believe that the need for transparency pre-empts the timing at this stage of re-drafting detailed proposals.</p>
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		agreed, with an appropriate level of impact assessment.	
CMC_09_22 - Secondary Trade Approval Notification			

NB please add extra rows as needed.