

APPENDIX C – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	ESB Generation and Trading
Type of Stakeholder	Generator
Contact name (for any queries)	Lenka Peskova
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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
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<p>CMC_25_23: Market Readiness Certification</p>	<p>ESB GT believes this proposal is in line with CMC objectives especially (a), (b) and (g).</p> <p>The proposal reflects the need for a secure and stable generation to be available as soon as possible and reduces the administrative burden on both sides of the commissioning process – developer’s side and TSOs’ side. The main feature of this proposal is to allow an earlier start for the new awarded capacity without reducing the final amount of Grid Code compliance testing and report that needs to be undertaken.</p> <p>This approach will allow developers to avoid the risk of significant levels of contract erosion and also provides the TSOs a sufficient time to review the final testing documents prior to issuing Final Operational Certificate at a time where there is a significant number of the new units undergoing commissioning process. All of the above positively affects security of supply on the island of Ireland and provides a significant benefit to the end consumer.</p> <p>However, for this proposal to realise these benefits to end consumer there is a need for the RAs to recognise that a unit</p>	<p>ESB GT supports the proposal as it addresses an issue that will be faced by the new commissioning capacity and the TSOs in the coming years.</p> <p>We believe the proposed introduction of the market readiness certificate will alleviate some of the time pressure that accompanies the process of commissioning multiple units within the same timeline.</p>	<p>No additional changes in proposed drafting identified.</p>
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	<p>achieving substantial or minimum completion through the application of a Market Readiness Certificate will not necessarily have completed the full suite of Grid Code testing and related reporting processes with their TSO required in order to receive the Final Operation Notification.</p> <p>In this case the market participant will be committed to undertake the balance of Grid Code testing and related reporting processes as quickly as is practicable. ESB GT requests the RAs to confirm that a market participant can reasonably interpret that the balance of the Grid Code testing and related reporting processes can be deemed a matter which does not prevent substantial completion as provided for under CMC clause J.2.1.1 (i).</p> <p>If this confirmation cannot be given ESB GT is concerned the value of the additional flexibility that the introduction of Market Readiness Certification will be lost.</p>		
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