

APPENDIX D – RESPONSE TEMPLATE

SUMMARY INFORMATION

| | |
|---------------------------------------|--|
| Respondent's Name | Clarke Energy Ireland Limited |
| Type of Stakeholder | Generator Equipment Provider |
| Contact name (for any queries) | John Curley |
| Contact Email Address | john.curley@clarke-energy.com |
| Contact Telephone Number | 01 2810010 or 087 9804002 |

CAPACITY MARKET CODE MODIFICATIONS CONSULTATION COMMENTS:

APPENDIX D – 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_20 Modification to Implement amendments as required by the Clean Energy Package Regulation EU 2019/943</p> <p><u>Clarke Energy Point A</u></p> | <p>Clarke Energy welcomes the modified wording of D.4.1.1 in CMC_05_20_v2 (SEM-20-023 (b) App B) and the Technical Guidance document that will be published by the RA's.</p> <p>Clarke Energy agrees with the clarification by the RAs in paragraph 6 of Appendix C regarding the calculation of CO₂ emissions from high efficiency CHP units and the explicit guidance that the well-established EU ETS methodology determining CO₂ emissions associated with electricity produced by high efficiency CHP units can be used in this regard.</p> <p>The EU ETS system includes the emissions calculation methodology known as the Heat Bonus Approach by the European Investment Bank. This is covered in detail in Section 8 Annex VII of the <i>Commission Delegated Regulation (EU) 2019/331 of 19 December 2018</i></p> | | |

APPENDIX D – 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_20 Modification to Implement amendments as required by the Clean Energy Package Regulation EU 2019/943</p> <p><u>Clarke Energy Point B</u></p> | <p>Clarke Energy welcomes the modified wording of E.7.4.4 and 7.4.5 in CMC_05_20_v2 (SEM-20-023 (b) App B) and the Technical Guidance document that will be published by the RA's.</p> <p>Clarke Energy agrees with the clarification by the RAs in paragraph 7 of Appendix C regarding the treatment of DSUs and AGUs in the context of CO₂ emissions from high efficiency CHP units.</p> <p>AGUs and DSUs should only have that element(s) (Generator(s)) which do not comply with the CO₂ limits rejected from the Application for Qualification.</p> | | |

APPENDIX D – 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_20 Modification to Implement amendments as required by the Clean Energy Package Regulation EU 2019/943</p> <p><u>Clarke Energy Point C</u></p> | <p>Clarke Energy welcomes the modified wording of CO₂ Limits in the Glossary in CMC_05_20_v2 (SEM-20-023 (b) App B) and the Technical Guidance document that will be published by the RA's.</p> <p>Clarke Energy agrees that this provides clarity about the basis of CO₂ emission limits consistent with the Clean Energy Package (CEP)</p> | | |

NB please add extra rows as needed.