

## APPENDIX D – RESPONSE TEMPLATE

### SUMMARY INFORMATION

<b>Respondent's Name</b>	Fingleton White
<b>Type of Stakeholder</b>	Generator
<b>Contact name (for any queries)</b>	Ronan Nevin
<b>Contact Email Address</b>	Ronan.nevin@fingleton.ie
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### 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
<p><b>CMC_05_20</b></p> <ul style="list-style-type: none"> <li>- Modification to Implement amendments as required by the Clean Energy Package Regulation EU 2019/943</li> </ul>	<p>Fingleton White welcomes the addition of D.4.1.1 and the Technical Guidance document that will be published by the RA's.</p> <p>Fingleton White 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 know 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> <p>Fingleton White supports the clarification in E.7.4.4</p> <p>Fingleton White does not support paragraph 8 of Appendix C.</p>		

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