

GNI Further Response to SEM-20-023

ID	Proposed Modification and its Consistency with the Code Objectives	Impacts Not Identified in the Modification Proposal Form	Details of the Existing Proposed to Deliver the Modification
<p>CMC_05_20</p> <ul style="list-style-type: none"> - Modification to Implement amendments as required by the Clean Energy Package Regulation EU 2019/943 	<p>GNI welcomes the addition of D.4.1.1 and the Technical Guidance document that will be published by the RA's.</p> <p>We believe that the modification ensures that the approach being taken is consistent with the principles outlined in Article 3 of EU 2019/943 namely (emphasis added)</p> <p><i>(f)</i> <i>market rules shall enable the decarbonisation of the electricity system and thus the economy, including by enabling the integration of electricity from renewable energy sources and by providing incentives for energy efficiency;</i></p> <p><i>(g)</i> <i>market rules shall deliver appropriate investment incentives for generation, in particular for long-term investments in a decarbonised and sustainable electricity system, energy storage, energy efficiency and demand response to meet market needs, and shall facilitate fair competition thus ensuring security of supply;</i></p> <p>Any measures which would prevent high efficiency CHP units from participating in the auctions would be counterproductive to the EUs stated aim of a move towards sector coupling, in this case of the heat and power generation sectors. This modification by the RAs is most welcome in this regard.</p>		