

APPENDIX C – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	Bord Gáis Energy Limited (BGE)
Type of Stakeholder	Generator (all-island wholesale electricity market); Supplier (Irish retail electricity market)
Contact name (for any queries)	Julie-Anne Hannon
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Contact Telephone Number	

CAPACITY MARKET CODE MODIFICATIONS CONSULTATION COMMENTS:

Please see all comments in tables provided for each Modification respectively below.

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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
<p>CMC_10_20 - Change to determinations made in F.4.1.1 (Version 2)</p>	<ul style="list-style-type: none"> ○ BGE supports the proposal by the Utility Regulator to clarify in the CMC that the 'locational capacity constraint required quantity' determined for each capacity auction is a "net" figure not a "gross" figure. I.e. the figure should take account of any capacity already awarded in a locational capacity constraint area. ○ This is welcomed for the additional transparency in understanding how these volumes are calculated for each auction and the capacity requirement(s). ○ The CMC changes suggested are practical and intuitive. <p>Deemed consistent with Code Objectives. In addition to objective (b) "facilitate the efficient, economic and coordinated operation, administration and development of the Capacity Market and the provision of adequate future capacity in a financially secure manner" it should also greatly further objective (e) "provide transparency in the operation of the SEM"</p>	<p>No additional impacts identified.</p>	<p>Drafting appears in order.</p>

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<p>CMC_11_20</p> <ul style="list-style-type: none"> - Providing greater flexibility for the current Interim Secondary Trading Notification (ISTN) process (Version 2) 	<ul style="list-style-type: none"> o BGE supports the proposal by Energia to allow for greater flexibility in the current capacity market Interim Secondary Trading Notification (ISTN) process. o The current ISTN is limited – more flexibility will allow early returns from outage which would mitigate ‘hole in hedge’ concerns and maximise generator availability and better accommodate system requirements. o 5WD timeline suggested for submission of an ISTN in advance of it becoming active is supported and we understand the SOs believe this to be achievable o We also support the move to amending existing ISTNs with 1WD notice (from 3WD notice) over time. o The timeline of the secondary capacity platform Mod proposal currently with the RAs shouldn’t be impacted by this mod. This mod CMC_11_20 is a complement to that if the former (capacity platform mod) is adopted/ approved. <p>Appears in line with Code objectives. In addition to furthering objectives (b) and (g) it should also better facilitate participating in the capacity market in line with CMC objective (c)</p>	<p>No additional impacts identified.</p>	<p>Drafting appears in order.</p>

NB please add extra rows as needed.