

Date: 14th of September 2020

Re: EAI Response to Capacity Market Code Working Group 14 - CMC_10_20 and CMC_11_20 Consultation Paper (SEM-20-056)

By email to Kevin.Lenaghan@uregni.gov.uk & Kevin.Baron@uregni.gov.uk

EAI welcomes the opportunity to respond to Consultation Paper [SEM-20-056](#) (“the Consultation Paper”).

CMC_11_20 – Providing Greater Flexibility for the Current Interim Secondary Trading Notification (ISTN) Process (v2)

EAI strongly supports the ‘minded to’ position of the RA’s to approve modification proposal CMC_11_20.

- We agree that the current Interim Secondary Trading Arrangements are highly restrictive and that the proposed modification is essential in providing additional flexibility that will assist market participants in managing the risk of their Reliability Option (RO).
- EAI agrees with the justification outlined in the modification proposal which includes addressing the unfair treatment of plants when partially available and weakening the incentive for plants to adjust their outage to the benefit of system requirements.
- EAI is supportive of reducing the notice times to both active an ISTN (5 Working Days) at the commencement of a planned outage and to amend the ISTN (ideally 3 Working Days but with a commitment to reducing to 1 Working Day over a 12 month period from implementation) during the course of a planned outage to reflect varying volumes of Net Capacity Quantity.
- EAI would emphasise the urgency of implementation of the proposed modification as soon as possible so that market participants and the SO can avail of the much-needed additional flexibility that this creates.
- Furthermore, this modification proposal should supplement modification proposal CMC_09_19, which seeks to introduce Alternative Secondary Trading Arrangements, as intended.

In summary, this is an essential modification to provide the necessary flexibility to manage RO risk. EAI supports its implementation as soon as possible and that once it does not impact the delivery of CMC_09_19, it is applied supplementary to modification proposal CMC_09_19 in relation to Alternative Secondary Trading Arrangements.



CMC_10_20 –Change to Determinations made in F.4.1.1 (v2)

EAI supports the proposed modification CMC_10_20 and welcomes the RA minded to position to approve it.

Please do not hesitate to contact us if you wish to further discuss any aspect of our response.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'J.M.', with a long horizontal line extending to the right.

Dr John MacNamara

Chair EAI Markets Committee