

APPENDIX D – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	ESB Generation & Trading
Type of Stakeholder	Generator
Contact name (for any queries)	Catherine McHale
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Contact Telephone Number	0868480966
Confidential Response	[N]

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
CMC_03_21 v3 - Modification to the provisions for Substantial Financial Completion	<p>ESB Generation and Trading (ESB GT) understands that the proposed modification facilitates CMC Objectives (b) (efficiency), (d) (promote competition) and (f) (non-discriminatory).</p> <p>ESB GT agrees with the principal of this modification in promoting increased competition and efficiency in the CRM and maximising units</p>	<p><u>Termination Charges & Performance Security Posting</u> As already seen in SEM-21-059 the SEMC is considering various methods to reduce delivery uncertainty of new awarded capacity. ESB GT is concerned that through the implementation of this mod the RA's may be sending mixed messages to the market. While they are trying to promote new</p>	<p>Drafting on the inclusion of demand site details in reporting.</p> <p>J.4.2.6 Each Implementation Progress Report shall include:</p> <p>(a) details of any Milestones achieved;</p> <p>(b) details of progress against outstanding Milestones;</p>

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	<p>ability to participate in the CRM process.</p> <p><u>Modelling Risk & Impacts</u> ESB GT is of the view that the proposal for this modification needs to balance the alternative opportunities given to DSUs/AGUs with the requirement to ensure awarded capacity is delivered. However, ESB GT also agrees with the TSO concerns that the implementation of this mod may increase the risk associated with modelling ahead of a T-1 Capacity Auction. The TSO stated that the information would feed into reports on generation adequacy and locational constrains. If the volume of capacity yet to be delivered became increasingly difficult to predict, then the knock-on impact could have significant cost impacts for the consumer and security of supply concerns.</p>	<p>capacity to successfully deliver at the same time certain units are afforded an alternative SFC provision where the certainty of delivery is not required until 4 months prior to delivery.</p> <p>ESB GT agrees that the increased Performance Security Posting & Termination charges on the DSU/AGU units do go some way to promoting delivery but the contractual obligation is not provided for on the SFC date and this will increase delivery risk for the TSO.</p>	<p>(c) identified or potential delays in achieving outstanding Milestones; and</p> <p>(d) actions being taken to mitigate any delays.</p> <p>(e) Where a unit has achieved Substantial Financial Completion under J.2.1.3.(a)(ii), then report must include details of identified individual Demand Sites</p>

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	<p><u>Implementation Progress Reports</u> ESB GT agrees with the proposal by the RAs in their minded to decision that as part of the extended reporting requirements DSUs/AGUs must include identification of individual demand sites where know as a precautionary measure to ensure no duplication occurs. This measure may in turn help create more certainty to the TSOs when calculating the volume of capacity yet to be delivered.</p> <p>ESB GT believes that further information and assurance is required on the modelling impacts to the TSO that this modification may have before it is approved.</p>		
<p>CMC_12_21 - Modification to the methodology for calculating the De-Rated Grid Code Commissioned Capacity</p>	<p>ESB GT agrees that the proposed modification facilitates CMC Objectives (b) (efficiency) and (f) (non-discriminatory).</p> <p>ESB GT is in agreement with this modification and the amendments removing legacy text in the</p>		<p>In Section G3: Commissioned Capacity the number of the following points is incorrect and should be corrected to the below:</p> <p>G.3.1.2B G.3.2.1B The value of Grid Code Commissioned Maximum On Time in respect of a Demand Side Unit at a given time is the</p>

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	<p>calculation of the Commissioned Capacity (qCCOMMISSΩy) in G.3.1.8 and the removal of Gross De-rated Capacity from the calculation of De-Rated Grid Code Commissioned Capacity G.3.1.4.</p> <p>The amendments remove inconsistencies remaining after modification CMC_06_19 and align the code with market design and de-rating principals.</p>		<p>Maximum Down Time based on the Final Compliance Certificate, Operational Certification or Final Operational Notification for that Demand Side Unit under the applicable Grid Code.</p> <p>G.3.2.1C G.3.1.2C For a Generator Unit (other a Demand Side Unit or Aggregated Generator Unit), the Grid Code Commissioned Maximum On Time may differ from the Initial Maximum On Time included in the Application for Qualification only where this does not result in a breach of the relevant Connection Agreement(s) (as modified from time to time).</p> <p>G.3.2.1D G.3.1.2D For a Demand Side Unit or Aggregated Generator Unit, the Grid Code Commissioned Maximum On Time may differ from the Initial Maximum On Time</p>

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			included in the Application for Qualification.

NB please add extra rows as needed.