

APPENDIX C – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	ESB Generation and Trading
Type of Stakeholder	Generator
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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_19_23: Modification to Implement the SEMC Decision set out in SEM-23-038 and SEM-23-045 on Indexation of Capacity Payments	<p>ESB GT agrees the proposed modification is in line with Code Objectives (b), (d) and (g).</p> <p>As stated in our response to SEM-23-014 we do believe the short-term reactionary proposal can create an unfair competitive advantage in the current economic conditions and the introduction of the enduring solution would send a more appropriate</p>	<p>While the proposed modification sufficiently covers the mechanics of the Capacity Payment Price Indexation Factor (FPCP) calculation, the actual obligation for TSO to publish the final value for each auction is not codified.</p> <p>ESB GT understand that there may be a different FPCP values used for different projects that</p>	M.13.7 The Capacity Payment Price Indexation Factor based on the Capacity End Date determined in M.13.3 will be published no later than the start of the first Capacity Year to which the Awarded new Capacity relates

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	investment signal for the future capacity auctions.	opted in for the option where Capacity Payment Price Indexation End date is the date of SFC. We however believe the publication of the overall FPCP value based on the Capacity Payment Price End Date set up to the day before the first day of the first Capacity Year to which the Awarded new Capacity relates should be available to all market participants. This degree of transparency is required to ensure the modification aligns more fully with Code Objective (d) and meets the requirements of Code Objective (e).	

NB please add extra rows as needed.