

APPENDIX C – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	Bord Gáis Energy
Type of Stakeholder	Generator in the all-island single electricity market; supplier in the Irish retail market
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Confidential Response	[N]

Summary of Main Messages

Bord Gáis Energy (**BGE**) welcomes the opportunity to respond to this SEM-23-097 consultation on the Urgent modification proposal that was initially discussed at the Capacity Market Code (**'Code'**) Working Group 34:

CMC_25_23: Market Readiness Certification

BGE is supportive of the proposed urgent modification. As stated in our response to SEM-23-084, BGE were supportive in principle of *CMC_21_23 Minimum Completion on Receipt of Interim Operational Notification (ION)* but accepted the concerns of the TSO stated in Working Group 33 that ION alone would not be sufficient to demonstrate the ability to provide capacity safely and reliably. BGE welcomes the engagement by the TSO in outlining the subset of grid requirements necessary for generators to contribute to system adequacy in the form of the Market Readiness Cert (MRC). We believe the subset of grid code requirements outlined, strikes the correct balance in terms of ensuring the reliability of capacity while also allowing the capacity to contribute to security of supply prior to receiving FON.

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By maintaining the FON timeline as is it is in the CMC, there is still sufficient motivation for participants to complete all aspects of the Grid Code Testing. BGE is of the view that this modification will not reduce the incentive for units to complete all aspects of grid code testing (Achieving FON) and instead will increase the motivation for Units to complete the subset of grid requirements in the MRC. As a result, this will constitute an improvement in terms of Security of Supply.

BGE welcomes the clarification provided by the TSO regarding the ability to achieve MRC on secondary fuel, this is an important feature to achieve the stated aim on improving security of supply given the risks that exist of potential delays to gas connection. We believe this should be outlined in the MRC requirements document as it is not explicitly outlined in the mod itself.

CAPACITY MARKET CODE MODIFICATIONS CONSULTATION COMMENTS:

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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_25_23: Market Readiness Certification</p>	<p>BGE Supports the Proposed Modification as it is currently drafted.</p> <ul style="list-style-type: none"> (a) to facilitate the efficient discharge by EirGrid and SONI of the obligations imposed by their respective Transmission System Operator Licences in relation to the Capacity Market; (b) to 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; (g) through the development of the Capacity Market, to promote the short-term and long-term interests of consumers of electricity with respect to price, quality, reliability, and security of supply of electricity across the Island of Ireland. 	<p>The MRC requirements document should be updated to reflect that MRC requirements can be met on while running on secondary fuel.</p>	<p>NA</p>

NB please add extra rows as needed.