

APPENDIX C – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	Bord na Móna
Type of Stakeholder	Generator
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Confidential Response	[N]

CAPACITY MARKET CODE MODIFICATIONS CONSULTATION COMMENTS:

1) CMC_25_23: Market Readiness Certification

The SOs stated that the Modification is aimed at reducing timings under the CMC and that they were bringing this Modification forward based on concerns they have heard from developers around the length of time for commissioning and testing in Ireland and Northern Ireland.

Bord na Móna (BnM) commend and support the thrust of the SO's proposal to expedite generation capacity which could be made available to the market to mitigate generation shortfalls and manage risk to security of supply.

Notwithstanding the areas where we seek greater clarification we fully support the introduction of this modification as soon as possible.

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There are three areas where we would seek greater clarification:

- i) While the SOs are stating that the list of what is included within the proposed 'Market Readiness Certificate' (MRC) is what is needed to participate for short-term SoS, we would welcome an understanding on what the biggest difference between the MRC and Final Operational Notification (FON) would be, i.e., to understand what is not included in the MRC but which is included in the FON.
- ii) Furthermore, we would be interested as to how the period between MRC and FON would be framed.
- iii) We raise an issue around the proposed wording of the Market Readiness Certificate and would request that, to avoid confusion, wording is rephrased such as to not potentially translate that a 'Market Readiness Certificate ..can be used instead of a market readiness certificate'.

Market Readiness Certificate in relation to a new or refurbished Generator Unit or Interconnector, means a certificate issued by the relevant System Operator confirming that the new or refurbished Generator Unit or Interconnector has successfully completed the relevant compliance tests, as published from time to time by the relevant System Operator, under the Grid Code. This includes a notification, certificate, permit or authorisation having equivalent effect that is issued by the relevant System Operator **instead of a market readiness certificate.**

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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>BnM supports the System Operators’ positioning with regard to this Modification Proposal furthering the Code objectives set out in Section A.1.2 including:</p> <p><i>(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;</i></p> <ul style="list-style-type: none"> By facilitating the availability of new capacity in a more expeditious manner and mitigating a termination risk associated with compliance testing and certification. <p><i>(c) to facilitate the participation of undertakings including electricity undertakings engaged or seeking to be engaged in the provision of electricity capacity in the Capacity Market;</i></p> <ul style="list-style-type: none"> By facilitating the availability of new capacity in a more expeditious manner and mitigating a termination risk associated with compliance testing and certification. <p><i>(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.</i></p> <ul style="list-style-type: none"> By facilitating the availability of new capacity while maintaining appropriate compliance requirements. 	<p>We would welcome an understanding on what the biggest difference between the MRC and FON would be, i.e., to understand what is not included in the MRC but which is included in the FON.</p> <p>Furthermore, we would be interested as to how the period between MRC and FON would be framed.</p>	<p>We do not seek to detail further CMC Drafting Proposed to Deliver this Modification.</p>