

## APPENDIX C – RESPONSE TEMPLATE

### SUMMARY INFORMATION

<b>Respondent's Name</b>	ESB Generation and Trading
<b>Type of Stakeholder</b>	Generator
<b>Contact name (for any queries)</b>	Lenka Peskova
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<b>Contact Telephone Number</b>	085 220 6313
<b>Confidential Response</b>	[N]

### CAPACITY MARKET CODE MODIFICATIONS WORKSHOP 34 CONSULTATION COMMENTS:

<b>ID</b>	<b>Proposed Modification and its Consistency with the Code Objectives</b>	<b>Impacts Not Identified in the Modification Proposal Form</b>	<b>Detailed CMC Drafting Proposed to Deliver the Modification</b>
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<p><b>CMC_24_23: Revision of the Exception Application timelines</b></p>	<p>ESB GT believes this proposal is in line with CMC objectives specifically (b), (c), and (d).</p> <p>As mentioned in our response to <i>CMC-20_23: Amendment to Timing of Opt Out Notifications</i> ESB GT supports the rationale of making changes to the timings of the Exception Application Process to ensure owners of the aging plants are able to fully assess the economic considerations of continuing the operation of a generation unit for another year.</p> <p>The current process where the Opt-Out Notification Date is in advance of the Exceptional Application Decision Date does not properly recognize the risks facing the current conventional generation portfolio on the island of Ireland and the costs associated with the keeping these aging plants operational and therefore contributing to the security of supply.</p>	<p>ESB GT supports the rationale of this proposal and agrees with the proposer that Opt-Out notification should be made after the Unit Specific Price Cap (USPC) application is assessed and a decision on that application is issued.</p> <p>We note the recent consultation regarding the Introduction of the Intermediate Length Contracts which, if approved, may mitigate some of the risk associated with the current situation and potentially encourages investments into existing conventional generation fleet. While some older generation sites will be able to avail of this option and potentially prolong their operating life, other sites may not be suitable for such investment. These older sites could still significantly contribute to the security of supply and help to mitigate the adequacy deficit (as described in</p>	<p>While we support the rationale of the proposal, we believe the publication of the Initial Auction Information Pack (IAIP) should be the first step in the auction timeline process to ensure the Existing Capacity Price Cap has been published and the application for the Unit Specific Price Cap can be submitted by reference to the published position of the RAs regarding that price cap.</p> <p>Proposed Auction Timeline:</p> <ol style="list-style-type: none"> <li>1. IAIP publication date</li> <li>2. Exception Application Date</li> <li>3. Exception Application Decision Date</li> <li>4. Opt-Out Notification Date</li> <li>5. Qualification Application Date</li> <li>6. Provisional Qualification Result Date</li> <li>7. Final Qualification Submission Date</li> <li>8. Final Qualification Results Date</li> </ol>
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		<p>the recently published Generation Capacity Statement 2023 – 2032) to overcome the time where the new and refurbished generators are being delivered.</p> <p>ESB GT understands the current Exception Application process is both labour and time intensive and believes RAs should undertake a comprehensive review that should seek to streamline the process to the benefit of all market participants, the TSOs and the RAs.</p>	
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