Lumcloon Energy Limited
Parson's House
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Tullamore
Co. Offaly

24-02-2017

Karen Shiels
Utility Regulator
Queens House
14 Queen Street
Belfast
BT1 6ED

Thomas Quinn
Commission for Energy Regulation
The Exchange
Belgard Square North
Dublin 24

Dear Thomas and Karen,

Lumcloon Energy Limited (LEL) welcomes the opportunity to respond to the SEM Committee Capacity Market Code (CMC) consultation paper (SEM-17-004).

If you have any queries in relation to our response, please contact us by return.

Yours faithfully,

Nigel Reams
Director
Lumcloon Energy Ltd.

ID	I-SEM CMC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the CMC	Relevant Cross-Reference for any impacted section
1	C.2	Constraint information	Information regarding forecasted constraints over investment time-periods should be published by the TSO, and this should be an obligation.		
2	D2.1.5 (a)	T-1 Transitional Auctions	The T-1 auctions should be pulled earlier in the transitional phase so that new entrants have adequate chance to participate.		E.7.5.1
3	E.2.1.2	Developing technology opt-out	Where the Grid Code is under a state of known development with regards to dispatchability (e.g. under DS3) and there is uncertainty regarding a new entrant's requirement to be dispatchable, there should not be a requirement to participate in the CMC.		
4	E.7.5.1	System Operator rejection of new capacity	Particularly for the T-1 transitional auctions, the requirement to be delivered in advance of the capacity year should be removed.		D.2.1.5
5	J (Throughout)	Deeply unreasonable and unduly onerous "permission" requirements for new entrants	Section J appears to bring the System Operator into the development team of a new entrant on a contractual basis. LEL believes that the System Operator already has all the necessary technical control under the connection agreement. There is no need for the secondary line

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			of reporting which could put the developer under technical default of the CMC. The Implementation Bond acts as sufficient guarantee for delivery of capacity.		