

## APPENDIX C – RESPONSE TEMPLATE

### SUMMARY INFORMATION

<b>Respondent's Name</b>	Energia
<b>Type of Stakeholder</b>	Generator
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### CAPACITY MARKET CODE MODIFICATIONS 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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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><b>CMC_11_18</b> – Long Stop Date</p>	<p>Whilst Energia support the intent of the Modification in relation to the Code Objectives, we note some inconsistencies with the drafting as proposed.</p> <p><b><u>Substantial Financial Completion Period</u></b></p> <p>Energia notes the comments in the Consultation Paper (SEM-18-152) that the term “Substantial Financial Close Period” was to be renamed “Substantial Financial Completion Period” for improved consistency with the rest of the CMC. Whilst the Consultation Paper (paragraph 2.2.5) states that this was in relation to paragraph J.5.2.1 in the CMC, it was our understanding from the Working Group that this renamed term would be applicable to each updated paragraph within the CMC, otherwise the desired improved consistency would not be achieved. Furthermore, upon review of Modification CMC_11_18, Energia would note that this has not been updated following the Working Group to reflect the amended term that was agreed.</p> <p>Also importantly, as per the SEM Committee Decision (SEM-18-030), this amendment to the CMC must apply to the 2019/20 T-1 Capacity Auction. However the additional clause to be added to sub-para D.3.1.2 (r) of the CMC states that the final Substantial Financial Completion Period is to be detailed in the Initial Auction Information Pack for the relevant auction.</p>	<p>If the drafting to be included in the CMC as per the current Proposal form is not updated, there will be inconsistencies within the CMC and potential confusion over the period to achieve the Substantial Financial Completion milestone.</p> <p>Importantly, as currently drafted it is proposed that the Substantial Financial Completion Period is included in the Initial Auction Information Pack. This document has already been published for the T-1 2019/20 Capacity Auction. As it is not necessary to have this information in the initial AIP and it is necessary to implement the modification for the T-1 2019/20 auction we suggest publication in the Final Auction Information Pack instead.</p>	<p>As outlined previously, the drafting in the Modification Proposal to be included in the CMC has not been updated as discussed in the Working Group and does not promote consistency with the rest of the CMC. Energia are of the view that the term “Substantial Financial Completion Period” needs to be used throughout the CMC.</p> <p>In addition the proposed new sub-para D.3.1.2(r) should instead be changed to F.5.1.3 (q) to ensure the proposal modification applies to the T-1 2019/20 Capacity Auction as required by SEMC Decision SEM-18-030.</p>

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	<p>However the Initial Auction Information Pack has already been published for the 2019/20 T-1 Capacity Auction. It is therefore too late to include this information in that document. We therefore suggest that the Substantial Financial Completion Period be included in the Final Auction Information Pack instead. This could be reflected in the CMC by replacing the intended sub-para D.3.1.2 (r) with sub-para F.5.1.3 (q) instead. This will have the intended and necessary effect of implementing the Modification for the T-1 2019/20 Capacity Auction as required by SEMC Decision SEM-18-030.</p> <p><b><u>Long Stop Date</u></b>            No comments – Energia are satisfied that the proposed Modification supports the Code objectives.</p>		

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<p><b>CMC_12_18</b> – Tolerance Class</p>	<p>Energia note that this Modification Proposal is also intending to implement the decision in SEMC Decision Paper (SEM-18-030) and are satisfied that the proposed Modification is consistent with the code objectives in doing so.</p> <p>However, there is a discrepancy in terms of when this Modification Proposal is intended to come into effect. As per Decision Paper SEM-18-030 (paragraph 3.5.1), this was to come into effect for the T-4 2022/23 Capacity Auction. However the Consultation Paper SEM-18-152 states that this is to come into effect for the T-1 2019/20 Capacity Auction and mistakenly quotes paragraph 4.4.4 from the Decision Paper. For clarity, paragraph 4.4.4 relates to the decision on the Substantial Financial Completion Period and Long Stop Date which is addressed in the above Modification Proposal CMC-11-18.</p>	<p>Energia are not aware of any impacts in the Modification Proposal Form which have not been identified.</p> <p>However, as noted previously, clarification needs to be provided that the Modification will not be applicable to the T-1 2019/20 Capacity Auction.</p>	<p>Energia are satisfied that the drafting to be included in the CMC to deliver the Modification is accurate and will implement the Modification as intended.</p>

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<p><b>CMC_13_18</b> – Letter of Credit</p>	<p>Energia are satisfied that the proposed Modification to amend references in the template Letter of Credit from “SO Bank” to “SEM Bank acting on behalf of the System Operators” removes an incorrect reference and therefore supports the Code objectives, albeit sufficient notice must be given to participants to submit amended Letters of Credit, as discussed further below.</p> <p>We would note that as this proposal will require participants to submit amended Letters of Credit. A reasonable amount of time is required to be provided to participants in order for them to submit this. Energia’s support of the Modification Proposal is dependent on this being provided.</p>	<p>The Modification Proposal Form does not refer to the need for adequate notice to be given to participants to submit amended Letters of Credit.</p>	<p>Subject to adequate notice being given to participants to amend Letters of Credit, Energia are satisfied that the drafting to be included in the CMC to deliver the Modification is accurate and will implement the Modification as intended.</p>

NB please add extra rows as needed.