

APPENDIX C – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	ESB GT
Type of Stakeholder	Generator
Contact name (for any queries)	Paraic Higgins
Contact Email Address	Paraic.higgins@esb.ie
Contact Telephone Number	01 7027119

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
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<p>CMC_11_18 – Long Stop Date</p>	<p>ESB agrees to the modification, however, the full impact on the governance of modifications and the processes as to how the RAs and TSOs will ensure that new modifications do not impact on processes that are already complete needs to be clearly specified</p>	<p>The consultation paper highlights that a discussion on how best to implement changes in the CMC to ensure that changes do not apply to processes that are already complete was had in the workshop (point 2.2.8) and that the RAs and SOs noted, in general, that care would need to be taken in regards to implementing changes to future auctions and the effect these could have in relation to ongoing processes (point 2.3.11). However, the consultation paper does not address these concerns nor does the modification clearly identify/assess this impact.</p> <p>More clarity and transparency on how the RAs intended to ensure that changes do not apply to processes that are already complete needs to be provided.</p>	<p>N/A</p>
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		<p>In terms of regulatory certainty and consistency moving forward with modifications, ESB would welcome clarification on how already completed contracts/on-going processes will be treated by future modifications. The current wording that the <i>“RAs and SOs noted, in general, that care would need to be taken in regards to implementing changes to future auctions and the effect these could have in relation to ongoing processes”</i> is insufficient.</p>	

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<p>CMC_02_18 – Tolerance Class</p>	<p>ESB believes the proposed modification needs to be revised to ensure it is future proofed against future SEMC decisions and thus no further modifications are needed to this modification.</p>	<p>If the SEMC decide in the future to allow other technologies a Dec Tol, the inclusion of <i>“means a class, based on technology and either emission limits or limits on running hours, used for determining the Increase Tolerance and Decrease Tolerance applicable to a Generator, Generator Unit or Interconnectors”</i> in the Glossary modification will result in a modification to the CMC_02_18 modification.</p> <p>As seen in the T&SC Modifications Committee, such a processes of modifying accepted modifications can become a burdensome processes. Therefore to prevent such an occurrence happening, ESB suggests that the Glossary be reworded, see next column.</p> <p>Furthermore, the rewording of the modification may also assist in preventing an urgent modifications on the back of</p>	<p>ESB suggests the Glossary modification should be reworded to</p> <p>Add to Glossary: Tolerance Class: Tolerance Classes will be determined by the Regulatory Authorities under paragraph D.3.1.3.</p>
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		SEMC decisions (for example CMC_14_18) which should only be used as a last resort when necessary.	
CMC_04_18 – Letter of Credit	N/A	N/A	N/A

NB please add extra rows as needed.