

APPENDIX C – RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	ESB Generation and Trading
Type of Stakeholder	Generator
Contact name (for any queries)	██████████
Contact Email Address	██████████████████
Contact Telephone Number	██████████

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_02_20</p> <ul style="list-style-type: none"> - Modification to the Required Timeframe for a T-4 Capacity Auction to take Place 	<p>ESB GT agrees that the modification is achieving CMC objective (a) to facilitate the efficient discharge by EirGrid and SONI of the obligations imposed by their respective Transmission System Operator Licences in relation to the Capacity Market. However, the potential to squeeze the construction timeframe, from 42 months to 40 months, for successful new capacity units could affect the risk profile for new entrants and promotion of competition in the provision of capacity to the SEM (objective (d)).</p>	<p>Further clarity is required on the timelines for new capacity post the new auction timetable. Currently in the IAIP there is the implementation progress reporting schedule (2.19) and it is unclear what impact this modification will on the schedule. Additionally, can it be confirmed that there is no change to the other milestones such as Substantial Financial Completion?</p> <p>At the time of writing this response, the current wording of the modification has left participants unclear of the proposed timetable. It appears that the auction could be delayed up to 40 months prior to the start of the capacity year. This would subsequently reduce the available construction time for new capacity from 42 months to 40 months. Considering the short consultation period, it is unclear what impact the compressed</p>	
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		<p>timeline could have on new build units that will have to construct as per the same rules as the CY 22/23 new capacity units.</p> <p>There needs to be an assessment of the CY23/24 timetable and the CY24/25 timetable (indicative that the auction will be in Sept 2020) as it would appear that an event may occur where participants will have to qualify/opt-out of the CY24/25 (Mar/Apr 2020) prior to the auction results of the CY23/24 (Apr/May 2020). This could place participants in an extremely difficult position that should not occur given that we are now in the enduring phase of the CRM.</p>	

NB please add extra rows as needed.