

APPENDIX C – RESPONSE TEMPLATE

SUMMARY INFORMATION

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

CAPACITY MARKET CODE MODIFICATIONS CONSULTATION COMMENTS:

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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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>CMC_02_20 Modification to the Required Timeframe for a T-4 Capacity Auction to take Place</p>	<p>Energia acknowledges the requirement to amend the CMC as proposed in circumstances where the original Auction timetable cannot be met.</p> <p>We note that the Modification proposal is seeking to allow flexibility to amend the Auction Timetable for this auction, however it does not deal with the approval of the Auction Timetable itself.</p> <p>As such it is important to clarify and verify the points referenced in the consultation paper under sections 2.1.11 – 2.1.12.</p> <p>As per comments previously submitted in relation to a proposed Auction Timetable for the T-4 2023/24 auction, Energia would have significant concerns in relation to the ‘Capacity Auction Submission Commencement’ being moved to 14th April 2020 with the subsequent ‘Capacity Auction Submission End’ date falling on the 20th April 2020. Our concerns with these proposed dates include:</p> <ul style="list-style-type: none"> - The proposed ‘Capacity Auction Submission Commencement’ falls on Easter Tuesday; - Many businesses in NI are closed on Easter Tuesday and in addition staff based in NI who enter and oversee the bid submissions do not work on this day; - Many key staff will be on leave during Easter week (reflecting the closure dates of schools) which will have an impact on both the internal approval processes for bidding and the bid submission processes for market participants. <p><i>(continued below)</i></p>	<p>Energia are not aware of any impacts in the Modification Proposal Form which have not been identified.</p>	<p>Energia are satisfied that the drafting to be included in the CMC to deliver the Modification, which excludes a specific Auction Timetable, is accurate and will implement the Modification as intended.</p>

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We suggest that as the proposed amendment to the timetable is as a result of a delay to the Provisional Qualification Results by approximately 5 ½ weeks, that each of the milestones in the timetable are also pushed out by the same duration to maintain the overall timeframe for the processes involved. Such an adjustment would address the significant concerns raised above of the auction taking place over the Easter holiday period. This amendment would result in the Capacity Auction Submission Commencement date being revised to 22nd April 2020 and the Capacity Auction Submission End date being revised to 28th April 2020 which would comply with the amended timeframe proposed in the Modification proposal.

Accordingly, we welcome confirmation from the RAs in the consultation paper “...that the timetable will also be reviewed to take on board concerns around the proximity to the Easter break.”(para 2.1.12). Energia is supportive of the Modification proposal on the understanding that the approved Auction timetable will be amended to reflect the above concerns.

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NB please add extra rows as needed.

