

APPENDIX A RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	Tynagh Energy Limited
Type of Stakeholder	Generator
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I-SEM CMC COMMENTS

ID	I-SEM CMC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the CMC	Relevant Cross-Reference for any impacted section
1	B.13.6.1	Termination	A suspension or termination in the DAM/IDM should not lead to an automatic suspension in the CMC via the T&SC (as in the consultation paper SEM-16-075).		
2	C.2.3.3	Form of Local Capacity Constraints	The methodology of how "the MW minimum de-rated capacity quantity that is to be cleared in a capacity auction for that area" should be consulted upon or at the very least published with the information in C.2.2.2		C.2.2.2

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3	D.3.1.2	Capacity Auction Information Pack	The indicative MW minimum de-rated capacity quantity for a locational constrained area should be published with the Information pack.		
4	E.9.4.1	Publication of Qualification Results	<p>TEL believe that the publication of individual unit qualification results would provide a transparent auction process for all participants.</p> <p>The publication of all data will ensure no market power issues and is consistent with the High Level Design principle of transparency.</p>		
5	F.5	Publication of Final Auction Parameters	<p>The timing of this is extremely short notice for market participants.</p> <p>Participants would need at least 15 working days before the auction.</p> <p>The use of “reasonable endeavours” is not appropriate.</p>	<p>The publication of final auction parameters should provide more time to participants similar to GB’s publication timelines.</p> <p>Removal of reasonable endeavours.</p>	F.3.1.7

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6	G.3.1.8	Capacity and Trade Register	Is this trade register meant to record the capacity traded in the secondary market? If so the table in G.3.1.8 does not appear to state secondary capacity.		
7	I.2.1.1 c (ii)	Obligations associated with awarded capacity	The wording of this statement is incorrect. A participant does not have the ability to schedule or provide sufficient energy. The central dispatch structure of I-SEM prevents a participant from scheduling itself.		
8	M.4	Local Capacity Constraints	TEL agree that the local capacity constraints should only be applied to the T-1 Auction.		

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9	Net Going Forward Costs	Glossary	<p>TEL agree that sunk costs should not be included in the NGFC calculation until the locational constraints have been removed and all capacity market units have equal opportunities.</p> <p>We believe that a participant should have the ability to recover their sunk costs in the Day-ahead, Intraday and Balancing Markets.</p>		
10	Consultation Paper 4.2	Transitional Auctions	<p>TEL agree with the RAs proposal for a transitional auction for the four-month period from go-live to the end of CY 2017/2018 and CY 2018/2019.</p>		
11	Consultation Paper 4.3	T-4 Auction	<p>TEL agree with the proposal to have the first T-4 auction in respect of CY2022/23.</p> <p>This should provide sufficient time to significantly review the locational constraints and reduce their impact.</p>		

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12	Consultation Paper 4.4	Auction Timetable	<p>TEL believe the transitional auctions (2019/20, 2020/21 and 2021/2022) should be held prior to the T-4 auction CY2022/23. This process should reduce the risk exposure to customers and CMUs from a CMU receiving a T-4 RO but nothing in the transitional auctions and subsequently having to exit the market.</p>	<p>Hold the three transitional auctions before the T-4 auction. TEL propose a small delay to the proposed T-4 auction timeframe to allow all transitional auctions to be performed in an orderly fashion.</p>	