

# I-SEM 2025-26 T-4 Capacity Auction Independent Auction Monitor Report

Commission for Regulation of Utilities (CRU) and the Northern Ireland Authority for Utility Regulation (NIAUR)

6<sup>th</sup> April 2022

**AUCTION REPORT - REDACTED** 



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## **1. INDEPENDENT ASSURANCE REPORT**

This report sets out our conclusions in relation to the monitoring of the processes and procedures followed by the System Operators (EirGrid and SONI Ltd; SOs) in conducting the Capacity Market Auction for the 2025/26 T-4 Capacity Auction, with respect to Capacity Auction Submissions submitted between 15<sup>th</sup> March 2022 and 10:00 on 24<sup>th</sup> March 2022, to ensure that it has been correctly carried out in accordance with the SOs' obligations under the Capacity Market Code (CMC).

## **1.1. SCOPE OF THE REPORT**

This report is produced in accordance with the terms of our engagement contract, dated 14th November 2017, for the purposes of reporting to the Regulatory Authorities – the Commission for Regulation of Utilities (CRU) and the Northern Ireland Authority for Utility Regulation (UR) – in connection with CEPA's arrangement as the Capacity Auction Monitor for the I-SEM Capacity Market Auctions.

Under the CMC, the SOs have various obligations with respect to qualification for and conducting of the Capacity Auctions. These obligations apply to Capacity Auctions which the SOs are required to satisfy under the CMC. The SEM Committee's decision approving the CMC and its associated procedures are available here:

https://www.semcommittee.com/news-centre/publication-i-sem-crm-capacity-market-code-decision

The most up to date version of the CMC, and approved and pending modifications, are available here:

https://www.sem-o.com/rules-and-modifications/capacity-market-modifications/market-rules/

CEPA's role as the appointed Capacity Auction Monitor for the I-SEM is to provide independent assurance to the market and the Regulatory Authorities (RAs) that the SOs have correctly carried out their obligations under the CMC in respect of qualification for, and running of, the Capacity Auctions, as set out in the Terms of Reference for the Capacity Auction Monitor.<sup>2</sup>

We monitored the processes and procedures followed by the SOs for the Capacity Auction, as far as possible, in accordance with our Terms of Reference for this engagement. We provide our conclusions (in Section 1.4 below) in relation to compliance with the CMC based on our obligations. This report is provided in accordance with Section B.10.4 of the CMC, which sets out the requirement for the Capacity Auction Monitor to provide a report to the RAs:

- confirming the list of Participants with Capacity Market Units that have been allocated Awarded Capacity;
- stating whether or not the Capacity Auction Monitor considers that the Capacity Auction was conducted in accordance with this Code; and
- identifying any actual or potential non-compliance with the CMC by the SOs.

Note that, except where expressly stated, we did not audit or otherwise verify the information provided to us by the SOs in the course of our work. A separate Capacity Market Auditor is required to be in place under the CMC, with its obligations set out within the Capacity Market Auditor Terms of Reference. For the avoidance of doubt, CEPA would like to make clear that we are a professional economic advisory firm and not professional accountants.

## **1.2. OUR APPROACH**

We developed a set of protocols and analytical tools to monitor the processes and procedures followed by the SOs for the Capacity Auction.

<sup>&</sup>lt;sup>2</sup> SEM Committee (2017): 'Capacity Remuneration Mechanism – Terms of Reference for the Capacity Market Auditor and Capacity Auction Monitor', SEM-17-023.



In carrying out our duties, we have followed a system of quality control, professional conduct, and ethical behaviour which we consider to be of a standard at least as demanding as that required by ISAE 3000 (Revised). This includes documented policies and procedures related to our monitoring activities, leadership responsibilities for quality control in the firm, independence and ethical requirements and management of human resources.

We have performed our work as the appointed Capacity Auction Monitor based on our fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behaviour.

### **1.3.** INHERENT LIMITATIONS

Our conclusions are based on historical information. The projection of any information or conclusions in the attached report to any future periods would be inappropriate.

Our examination excludes audit procedures and accordingly we do not express an audit opinion on the information. We note that the procedures we performed were not designed to and are not likely to reveal fraud.

An outline of the work we performed for the Capacity Auction is included in Appendix A.

## **1.4.** CONCLUSIONS

# Our conclusions in this report reflect reasonable assurance in relation to the T-4 Capacity Auction for the 2025/26 Capacity Year.

We believe that the procedures performed, and the evidence obtained, provide us with a reasonable basis that, except for the matters described in Section 4 of our report, the Capacity Auction was conducted by the SOs in accordance with the requirements of the CMC.

Actual and potential instances of non-compliance are summarised in Section 4.

### **1.5.** Use of the report

This report has been prepared for the exclusive use of the RAs in accordance with the scope of our engagement contract and the RAs' Terms of Reference for the Capacity Auction Monitor.

Our work has been undertaken solely for the purpose of assessing that the SOs have correctly carried out the obligations placed on them under the CMC in carrying out the Capacity Auction. Our work was not planned or conducted with any other objective in mind, and so cannot be relied on for any other purpose. With the exception of providing it to the RAs and the SOs, and publishing it on the SEM Committee website, our report is not to be recited or referred to in any document, copied or made available (in whole or part) to any person without our prior written consent. To the fullest extent permitted by law, CEPA does not accept or assume responsibility to anyone, other than the RAs, for this report or for the conclusions we have formed.

Cambridge Economic Paliny Associates

Cambridge Economic Policy Associates Ltd London, United Kingdom 6<sup>th</sup> April 2022



## 2. BACKGROUND AND CONTEXT

## 2.1. BACKGROUND

In the I-SEM Capacity Market, capacity providers sell qualified capacity to the market to meet the capacity requirement in a future capacity year. Capacity providers who are successful in the Capacity Auction receive a regular capacity payment that assists with funding generation capacity, and, in return, they have an obligation to generate when the system is stressed.

The operation of the Capacity Market and the roles and responsibilities of the market operator – split jointly between the SOs and the Single Electricity Market Operator (SEMO) – are governed by the CMC and the Trading and Settlement Code.

## 2.2. OUR ROLE AS CAPACITY AUCTION MONITOR

The Terms of Reference for the Capacity Auction Monitor state that:

"The purpose of the Capacity Auction Monitor is to provide independent assurance to the market and the Regulatory Authorities that the System Operators' are correctly carrying out their obligations under the Capacity Market Code (CMC) in respect of qualification for and running of Capacity Auctions."

and that:

"The Capacity Auction Monitor ("the Monitor") will be responsible for assuring the processes associated directly with Capacity Auctions, i.e., from the start of qualification through to the determination of the final auction results."

As Capacity Auction Monitor, we are required to produce a Report on the Capacity Auction, within two Working Days after the SOs have released provisional Capacity Auction Results to Participants, that:<sup>3</sup>

- confirms the list of Participants with Capacity Market Units that have been allocated Awarded Capacity;
- states whether or not the Capacity Auction Monitor considers that the Capacity Auction was conducted in accordance with the CMC; and
- where applicable, identifies any actual or potential non-compliance with the CMC or other actual or potential irregularity in the conduct of the Capacity Auction, together with the Capacity Auction Monitor's assessment as to the likely consequences of the actual or potential non-compliance or irregularity.

This report summarises our findings in relation to the Capacity Auction run by the SOs on 24<sup>th</sup> March 2022.

### 2.3. OBJECTIVES AND SCOPE

The CMC paragraph B.10.2.1 sets out that:

"The Capacity Auction Monitor shall monitor the processes and procedures followed by the System Operators in carrying out the Qualification Process, conducting Capacity Auctions and related activities under this Code, in accordance with the terms of reference determined by the Regulatory Authorities."

The basic tasks set out for the Capacity Auction Monitor are:

monitoring the Qualification Process to ensure that the SOs have complied with the CMC;

<sup>&</sup>lt;sup>3</sup> In the original CMC the deadline was two Working Days after the SOs release provisional Capacity Auction Results to the RAs. An update was proposed in modification <u>CMC\_01\_21</u>, approved in Capacity Market Code Working Group 18 Decision Paper (<u>SEM-21-048</u>), and therefore effective from 14<sup>th</sup> July 2021.



- being present at the auctions, with full read access to all key software, including access to all bids and all communications between the SOs and all bidders;
- monitoring the application of algorithms and calculations;
- reporting on whether it considers that the SOs have conducted the Capacity Auction in accordance with the CMC;
- identifying any actual or potential breach of the rules and regulations or other actual or potential irregularities in the conduct of the Capacity Auction by the SOs and an assessment of the consequences; and
- making recommendations on the changes to the CMC, Auction Guidelines and User Guides.

As Capacity Auction Monitor, we are required to report on all issues that we identify, irrespective of materiality.

Explicitly considered as within scope of the role of the Capacity Auction Monitor is to monitor compliance with the methodology employed by the SOs to determine Locational Capacity Constraints (LCCs) in the auction process (as referred to in Sections C.2 and F.4 of the CMC). Also, explicitly within scope is monitoring the application of the capacity auction algorithm used by the SOs to clear the Capacity Auction.

## 2.4. SCOPE EXCLUSIONS

In line with our Terms of Reference, the scope of our review excluded the following:

- Secondary trading arrangements (referenced specifically within Chapter H of the CMC).
- Direct investigation of market manipulation: However, the Terms of Reference state that the Capacity Auction Monitor should bring any incidents of potential market manipulation to the attention of the RAs, should it come across them in carrying out its duties.
- The determination of the LCCs and their underlying methodology: The Capacity Auction Monitor's scope in relation to LCCs is limited to assessing compliance by the SOs with the methodology for determining LCCs, including accordance with relevant procedures and process documentation.
- Auditing of the processes carried out by the SOs: The CMC requires a Capacity Market Auditor to be appointed separately from the Capacity Auction Monitor. Under our Terms of Reference, we are not required to carry out an audit of the processes followed, or information provided, by the SOs in running the auction.
- Monitoring of compliance with the obligations of Section L.7 of the CMC regarding SO reporting of REMIT Data on behalf of Participants.



## 3. AUCTION RESULTS

The Capacity Auction Submission Commencement date for the T-4 Auction was 15<sup>th</sup> March 2022; the SOs emailed Participants at 10:05 to inform them that the auction gate had opened at 10:00 as planned. The Capacity Auction Submission End took place at 10:00 on 24<sup>th</sup> March 2022.

Capacity Auction Run Start was scheduled for 12:00 on 24<sup>th</sup> March 2022. Auction Run was initiated at this time and was completed within a minute of initiation. The auction clearing process was completed within the 24-hour Allowed Timeframe.

The Capacity Auction was run using the Capacity Market Platform (CMP) version 3.1.1.4, according to information displayed in the CMP.

In line with the Final Auction Information Pack (FAIP), the parameters of the Demand Curve used in the 2025/26 T-4 Auction are set out in Table 3.1.

Table 3.1: Final Demand Curve used in the Capacity Auction, same as in FAIP 2025/26 T-4 v3.0 Table 1

De-Rated Capacity (MW)	Demand Curve Point (€/MW per year)				
0	146,920				
4,295	146,920				
4,826	92,300				
5,887	0				

The minimum capacity needed to satisfy the LCCs were as set out in Table 3.2.

Table 3.2: LCCs and minimum MW required, same as in FAIP 2025/26 T-4 v1.0 Tables 4 and 5

LCC Area 1 Name	Required Quantity	LCC Area 2 Name	Minimum MW
L1-1: Northern Ireland	2,312		
L1-2: Ireland	6,445	L2-1: Greater Dublin	2,678
		L2-2: Rest of Ireland	3,167

There were 145 offers for 113 CMUs in this Capacity Auction. This is out of a total of 208 qualified CMUs, 109 of which had Existing Capacity with a non-zero Firm Offer Requirement (and thus were required to submit offers). Of these, 92 had only Existing Capacity available to offer, and 17 had both Existing and New Capacity available to offer into this Capacity Auction. There were a further 20 CMUs that had a non-zero Firm Offer Requirement comprising only New Capacity, and therefore (under CMC F.2.1.1) these CMUs were not required to submit an offer.

All 145 offers were submitted directly by the relevant Participants.

A total of 6,484.468 MW cleared in the auction, with 112 CMUs being awarded all their offered capacity.

The Auction Clearing Price was determined in accordance with CMC F.8.3. The Price Setting Offer was an Inflexible offer cleared at  $\in$ 46,000.00/MW per year (£40,953.80/MW per year). This is lower than the Existing Capacity Price Cap ( $\in$ 46,150.00/£41,295.02 per MWh). In total, [ $\times$ ] offers were cleared at the Auction Clearing Price.

For the determination of the Auction Clearing Price, a total of [ $\times$ ] offers were initially scheduled. The offered quantity scheduled at the Auction Clearing Price was not sufficient to meet the LCC Required Quantities for Northern Ireland, Ireland, or Greater Dublin (but the L2-2: Rest of Ireland requirement was exceeded by [ $\times$ ]), and so additional offers needed to clear out of merit. As a result, all [ $\times$ ] remaining offers were cleared at their respective offer prices up to the Auction Price Cap of €146,920.00/MW per year.



Total Awarded Capacity, LCC Required Quantity, and the shortfall between the two is summarised in Table 3.3 below.

	L1-1: Northern Ireland	L1-2: Ireland	L2-1: Greater Dublin	L2-2: Rest of Ireland
Previously Awarded Capacity (MW) <sup>4</sup>	672.877	1,663.781	828.279	835.502
Capacity Cleared in T-4 Auction (MW)	1,805.599	4,678.869	1,499.210	3,179.659
Total Awarded Capacity (MW)	2,478.476	6,342.650	2,327.489	4,015.161
LCC Required Quantity (MW)	2,312.000	6,445.000	2,678.000	3,167.000
Shortfall between Required Quantity and Awarded Capacity (MW)	0.000	102.350	350.511	0.000

#### Table 3.3: Constraint status in the auction solution

In line with the CMC Modification,<sup>5</sup> which was required to comply with the State Aid decision to disallow the clearing of excess capacity to resolve local capacity constraints within an auction, some offers that are scheduled in the determination of the Auction Clearing Price may be 'removed' in the Auction Solution, in accordance with F.8.4.3 and F.8.4.4. In this Capacity Auction, one such offer was 'removed' in the constrained solution that had been scheduled in the unconstrained solution. This offer was for capacity with 10-year duration, located in L1-1: Northern Ireland and was not needed to satisfy the LCC minimum MW requirements in that area.

There were also [ $\approx$ ] offers that were cleared following the determination of the Auction Clearing Price, out of merit, at their respective offer prices. [ $\approx$ ] of these offers were for New Capacity and [ $\approx$ ] were from clean units.

Table 3.4 shows the relevant quantities of the above offers, as well as a summary of all changes between the unconstrained and constrained solutions.

Table 3.4: Changes between	the determination of the Auction	on Clearing Price and the A	uction Solution
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CMU ID	Capacity type(s) offered by this CMU	LCC Level 1	LCC Level 2	Offered Quantity (MW)	Cleared Q during Auction Clearing Price determination (MW)	Cleared Q in Auction Solution (MW)	Difference (MW)
[≫]	[×]	[≻]	[×]	[×]	[≫]	[×]	[≻]
[×]	[×]	[×]	[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]	[≫]	[×]	[×]
[×]	[×]	[×]	[×]	[×]	[≫]	[×]	[×]
[×]	[×]	[×]	[×]	[×]	[≫]	[≫]	[×]
[×]	[×]	[×]	[×]	[×]	[≫]	[×]	[×]
[×]	[×]	[×]	[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]	[≫]	[×]	[×]
[≫]	[×]	[×]	[×]	[×]	[≫]	[×]	[×]

<sup>4</sup> From multi-year contracts cleared in previous capacity market auctions.

<sup>5</sup> SEM-O (2019) "Capacity Market Code Urgent Modifications Set 2: Decision Paper"



CMU ID	Capacity type(s) offered by this CMU	LCC Level 1	LCC Level 2	Offered Quantity (MW)	Cleared Q during Auction Clearing Price determination (MW)	Cleared Q in Auction Solution (MW)	Difference (MW)
[×]	[×]	[×]	[×]	[×]	[≫]	[×]	[×]
[×]	[×]	[×]	[≻]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[≻]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]	[×]	[×]	[×]
[×]	[×]	[⊁]	[≫]	[×]	[⊁]	[≫]	[×]
[×]	[×]	[×]	[⊁]	[×]	[≫]	[≫]	[×]
[×]	[×]	[⊁]	[×]	[×]	[×]	[≫]	[×]
[×]	[×]	[⊁]	[≫]	[×]	[×]	[≫]	[×]
[×]	[×]	[⊁]	[≫]	[×]	[×]	[≫]	[×]
[×]	[×]	[×]	[⊁]	[×]	[≫]	[≫]	[×]
[×]	[×]	[⊁]	[≫]	[×]	[×]	[≫]	[×]
[×]	[×]	[×]	[⊁]	[×]	[≫]	[≫]	[×]
[×]	[×]	[⊁]	[≫]	[×]	[×]	[≫]	[×]
[×]	[×]	[×]	[⊁]	[×]	[≫]	[≫]	[×]
[×]	[×]	[×]	[×]	[×]	[×]	[×]	[×]
[≫]	[×]	[≻]	[⊁]	[×]	[≫]	[≫]	[×]
[×]	[×]	[×]	[⊁]	[×]	[≫]	[≫]	[×]
[×]	[×]	[≻]	[⊁]	[×]	[⊁]	[×]	[×]
[×]	[×]	[≻]	[×]	[×]	[×]	[×]	[×]
[×]	[×]	[≻]	[×]	[×]	[×]	[×]	[×]
[×]	[×]	[≻]	[⊁]	[×]	[⊁]	[×]	[×]
[×]	[×]	[≻]	[×]	[×]	[×]	[×]	[×]
[×]	[×]	[≻]	[×]	[×]	[≫]	[×]	[×]
[×]	[×]	[≻]	[×]	[×]	[×]	[×]	[×]
Total				[⊁]	[⊁]	[⊁]	[⊁]

Based on the outcome of the T-4 Auction, Table 3.5 lists the participants and corresponding CMUs that have been awarded capacity.



## 3.1. CMUS PROVISIONALLY AWARDED CAPACITY IN THIS CAPACITY AUCTION

Table 3.5: List of participants and CMUs provisionally awarded capacity in the T-4 Capacity Auction for the Capacity Year 2025/26

Party Name	Party ID	Participant ID	CMU ID	Technology class	LCC Level 1	LCC Level 2	Capacity Type	Quantity offered (MW)	Quantity awarded (MW)
ESB	PY_000030	PT_400030	CAU_400301	Hydro	L1-2	L2-2	Existing	[⊁]	195.651
ESB	PY_000030	PT_400033	CAU_400302	Wind	L1-2	L2-2	Existing	[×]	9.282
Dublin Waste to Energy Supply Limited	PY_000152	PT_400198	GU_402030	Steam Turbine	L1-2	L2-1	Existing	[×]	50.984
ESB	PY_000030	PT_400030	GU_400361	Pumped Hydro Storage	L1-2	L2-2	Existing	[×]	50.808
ESB	PY_000030	PT_400030	GU_400360	Pumped Hydro Storage	L1-2	L2-2	Existing	[×]	50.808
ESB	PY_000030	PT_400030	GU_400363	Pumped Hydro Storage	L1-2	L2-2	Existing	[×]	50.808
ESB	PY_000030	PT_400030	GU_400362	Pumped Hydro Storage	L1-2	L2-2	Existing	[×]	50.808
Indaver Energy Limited	PY_000101	PT_400087	GU_401230	Steam Turbine	L1-2	L2-2	Existing	[×]	14.348
Statkraft Markets GmbH	PY_034046	PT_402540	GU_404520	Other Storage	L1-2	L2-2	Existing	[×]	3.511
Contourglobal Solutions (Northern Ireland) Limited	PY_000081	PT_500048	GU_500900	Gas Turbine	L1-1		Existing	[×]	2.734
Ronaver Energy Limited	PY_000194	PT_400460	GU_403000	Gas Turbine	L1-2	L2-2	Existing	[×]	1.810
Statkraft Markets GmbH	PY_034046	PT_402540	GU_404010	Other Storage	L1-2	L2-2	Existing	[×]	1.529
Tynagh Energy Limited	PY_000041	PT_400041	GU_400530	Gas Turbine	L1-2	L2-2	Existing	[×]	336.800
Energia Power Generation Limited	PY_000044	PT_400044	GU_400540	Gas Turbine	L1-2	L2-1	Existing	[×]	336.800
Huntstown Power Company	PY_000033	PT_400035	GU_400480	Gas Turbine	L1-2	L2-1	Existing	[×]	292.410
Eirgrid Interconnector Designated Activity Company	IO_EIDAC	IO_EIDAC	I_ROIEWIC	Interconnector	L1-2	L2-2	Existing	[⊁]	218.500
EP Ballylumford Limited	PY_000056	PT_500040	GU_503730	Gas Turbine	L1-1		Existing	[×]	215.950
EP Ballylumford Limited	PY_000056	PT_500040	GU_503720	Gas Turbine	L1-1		Existing	[×]	215.950
Moyle Interconnector Limited	IO_MOYLE	IO_MOYLE	I_NIMOYLE	Interconnector	L1-1		Existing	[×]	202.500
EP Ballylumford Limited	PY_000056	PT_500040	GU_503740	Gas Turbine	L1-1		Existing	[×]	87.742
EP Ballylumford Limited	PY_000056	PT_500040	GU_500283	Gas Turbine	L1-1		Existing	[×]	51.898
EP Ballylumford Limited	PY_000056	PT_500040	GU_500284	Gas Turbine	L1-1		Existing	[×]	51.898
EP Kilroot Limited	PY_000070	PT_500045	GU_500820	Gas Turbine	L1-1		Existing	[×]	37.532
EP Kilroot Limited	PY_000070	PT_500045	GU_500821	Gas Turbine	L1-1		Existing	[×]	37.532



Party Name	Party ID	Participant ID	CMU ID	Technology class	LCC Level 1	LCC Level 2	Capacity Type	Quantity offered (MW)	Quantity awarded (MW)
Energia Customer Solutions NI Limited	PY_000042	PT_500030	GU_503350	Other Storage	L1-1		New	[×]	3.150
Powerhouse Generation Limited	PY_000128	PT_400144	DSU_401660	Demand Side Unit	L1-2	L2-2	Existing	[×]	3.804
iPower Solutions Ltd	PY_000093	PT_402574	DSU_403650	Demand Side Unit	L1-2	L2-2	New	[×]	3.580
iPower	PY_000093	PT_500053	GU_501130	Gas Turbine	L1-1		Existing	[×]	52.240
Powerhouse Generation Limited	PY_000128	PT_500078	GU_504000	Gas Turbine	L1-1		New	[×]	13.056
Powerhouse Generation Limited	PY_000128	PT_500078	DSU_501560	Demand Side Unit	L1-1		Existing	[×]	10.376
Energy Trading Ireland Limited	PY_000113	PT_500067	DSU_501380	Demand Side Unit	L1-1		Existing	[×]	9.000
iPower Solutions Ltd	PY_000093	PT_500053	DSU_503450	Demand Side Unit	L1-1		New	[×]	8.659
Powerhouse Generation Limited	PY_000128	PT_500078	DSU_501330	Demand Side Unit	L1-1		Existing	[×]	7.689
Energy Trading Ireland Limited	PY_000113	PT_500067	DSU_501510	Demand Side Unit	L1-1		Existing	[×]	7.000
Energy Trading Ireland Limited	PY_000113	PT_500067	DSU_501600	Demand Side Unit	L1-1		Existing	[×]	5.000
iPower Solutions Ltd	PY_000093	PT_500053	DSU_503480	Demand Side Unit	L1-1		Existing	[×]	4.923
Energy Trading Ireland Limited	PY_000113	PT_500067	DSU_501590	Demand Side Unit	L1-1		Existing	[×]	4.000
iPower Solutions Ltd	PY_000093	PT_500053	DSU_503420	Demand Side Unit	L1-1		Existing	[×]	3.770
Powerhouse Generation Limited	PY_000128	PT_500078	DSU_501330	Demand Side Unit	L1-1		New	[×]	0.167
Bord Gais ROI	PY_000027	PT_400028	GU_400930	Gas Turbine	L1-2	L2-2	Existing	[×]	368.964
Aughinish Alumina Ltd	PY_000024	PT_400024	GU_400120	Autoproducer	L1-2	L2-2	Existing	[×]	35.000
Aughinish Alumina Ltd	PY_000024	PT_400024	GU_400121	Autoproducer	L1-2	L2-2	Existing	[×]	57.687
Aughinish Alumina Ltd	PY_000024	PT_400024	GU_400120	Autoproducer	L1-2	L2-2	Existing	[×]	22.687
Contourglobal Solutions (Northern Ireland) Limited	PY_000081	PT_500048	GU_500904	Gas Turbine	L1-1		Existing	[×]	10.936
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_400116	DSU_401400	Demand Side Unit	L1-2	L2-2	Existing	[×]	23.033
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_400116	DSU_403520	Demand Side Unit	L1-2	L2-2	Existing	[×]	5.754
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_400116	DSU_403560	Demand Side Unit	L1-2	L2-2	Existing	[×]	5.466
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_400116	DSU_403640	Demand Side Unit	L1-2	L2-2	New	[×]	4.713
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_400116	DSU_403630	Demand Side Unit	L1-2	L2-1	New	[×]	3.574
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_400116	DSU_403560	Demand Side Unit	L1-2	L2-2	New	[×]	4.470
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_400116	DSU_401400	Demand Side Unit	L1-2	L2-2	New	[×]	2.289
Endeco Technologies Limited	PY_000126	PT_500099	DSU_501460	Demand Side Unit	L1-1		Existing	[×]	8.400



Party Name	Party ID	Participant ID	CMU ID	Technology class	LCC Level 1	LCC Level 2	Capacity Type	Quantity offered (MW)	Quantity awarded (MW)
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_400116	DSU_401870	Demand Side Unit	L1-2	L2-2	Existing	[×]	20.013
Endeco Technologies Limited	PY_000126	PT_400133	DSU_401530	Demand Side Unit	L1-2	L2-2	Existing	[×]	19.929
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_400116	DSU_402090	Demand Side Unit	L1-2	L2-2	Existing	[×]	16.474
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_400116	DSU_402120	Demand Side Unit	L1-2	L2-2	Existing	[×]	9.813
Endeco Technologies Limited	PY_000126	PT_400133	DSU_402180	Demand Side Unit	L1-2	L2-2	Existing	[×]	7.732
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_400116	DSU_402100	Demand Side Unit	L1-2	L2-2	Existing	[×]	7.448
Killala Community Windfarm DAC	PY_034108	PT_402586	GU_404550	Other Storage	L1-2	L2-2	New	[×]	2.603
Energy Stability Services	PY_034088	PT_402572	GU_404970	Gas Turbine	L1-2	L2-1	New	[×]	9.050
Crag Digitial Avoca Limited	PY_034122	PT_402600	GU_404840	Gas Turbine	L1-2	L2-2	New	[×]	5.000
Energy Stability Services Limited	PY_034088	PT_402572	GU_404240	Other Storage	L1-2	L2-1	New	[×]	3.615
Endeco Technologies Limited	PY_000126	PT_400133	DSU_401530	Demand Side Unit	L1-2	L2-2	New	[×]	0.468
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_502516	DSU_503460	Demand Side Unit	L1-1		Existing	[×]	2.683
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_502516	DSU_503460	Demand Side Unit	L1-1		New	[×]	3.776
ESB	PY_000030	PT_400033	DSU_401330	Demand Side Unit	L1-2	L2-2	Existing	[×]	7.740
ESB	PY_000030	PT_400033	DSU_401330	Demand Side Unit	L1-2	L2-2	New	[×]	3.059
SSE Airtricity Limited	PY_000021	PT_400021	CAU_400500	Wind	L1-2	L2-2	Existing	[×]	30.443
Endeco Technologies Limited	PY_000126	PT_400133	DSU_401910	Demand Side Unit	L1-2	L2-2	Existing	[×]	10.671
EnerNOC Ireland Ltd	PY_000088	PT_400090	DSU_403470	Demand Side Unit	L1-2	L2-2	Existing	[×]	6.272
EnerNOC Ireland Ltd	PY_000088	PT_400090	DSU_401610	Demand Side Unit	L1-2	L2-2	Existing	[×]	6.738
EnerNOC Ireland Ltd	PY_000088	PT_400090	DSU_401620	Demand Side Unit	L1-2	L2-1	Existing	[×]	6.454
EnerNOC Ireland Ltd	PY_000088	PT_400090	DSU_403120	Demand Side Unit	L1-2	L2-2	Existing	[×]	2.900
Veolia Alternative Energy Ireland Limited	PY_000122	PT_400124	DSU_401880	Demand Side Unit	L1-2	L2-2	Existing	[×]	15.930
Veolia Alternative Energy Ireland Limited	PY_000122	PT_400124	DSU_403660	Demand Side Unit	L1-2	L2-1	New	[×]	4.386
Veolia Alternative Energy Ireland Limited	PY_000122	PT_400124	DSU_401490	Demand Side Unit	L1-2	L2-2	Existing	[×]	3.410
Veolia Alternative Energy Ireland Limited	PY_000122	PT_400124	DSU_401880	Demand Side Unit	L1-2	L2-2	New	[×]	1.505
Veolia Alternative Energy Ireland Limited	PY_000122	PT_400124	DSU_401490	Demand Side Unit	L1-2	L2-2	New	[×]	0.895



Party Name	Party ID	Participant ID	CMU ID	Technology class	LCC Level 1	LCC Level 2	Capacity Type	Quantity offered (MW)	Quantity awarded (MW)
Statkraft Markets GmbH	PY_034046	PT_502514	GU_503950	Other Storage	L1-1		New	[×]	6.250
Statkraft Markets GmbH	PY_034046	PT_502514	GU_503960	Other Storage	L1-1		New	[×]	6.250
EnerNOC Ireland Ltd	PY_000088	PT_400090	DSU_403450	Demand Side Unit	L1-2	L2-2	Existing	[×]	8.020
EnerNOC Ireland Ltd	PY_000088	PT_500098	DSU_501450	Demand Side Unit	L1-1		Existing	[×]	1.029
Empower Generation Limited	PY_000111	PT_500073	GU_501230	Gas Turbine	L1-1		Existing	[×]	11.551
ESB	PY_000030	PT_400030	GU_400850	Gas Turbine	L1-2	L2-2	Existing	[×]	362.165
SSE Generation Ireland Limited	PY_000071	PT_400064	GU_400762	Gas Turbine	L1-2	L2-2	Existing	[×]	382.800
EnerNOC Ireland Ltd	PY_000088	PT_400090	DSU_401270	Demand Side Unit	L1-2	L2-2	Existing	[×]	20.000
EnerNOC Ireland Ltd	PY_000088	PT_400090	DSU_403080	Demand Side Unit	L1-2	L2-2	Existing	[×]	1.568
ESB	PY_000030	PT_400037	GU_400500	Gas Turbine	L1-2	L2-1	Existing	[×]	347.770
Avolta Storage Ltd	PY_034101	PT_402581	GU_404400	Other Storage	L1-2	L2-2	New	[×]	7.260
Statkraft Markets GmbH	PY_034046	PT_402540	GU_404510	Other Storage	L1-2	L2-1	New	[×]	2.057
Energy Trading Ireland Limited	PY_000113	PT_500067	DSU_501380	Demand Side Unit	L1-1		Existing	[×]	0.700
Energy Trading Ireland Limited	PY_000113	PT_500067	DSU_501510	Demand Side Unit	L1-1		Existing	[×]	0.600
Energy Trading Ireland Limited	PY_000113	PT_500067	DSU_501600	Demand Side Unit	L1-1		Existing	[×]	0.300
ESB	PY_000030	PT_400030	GU_400183	Gas Turbine	L1-2	L2-2	Existing	[×]	80.910
ESB	PY_000030	PT_400030	GU_400182	Gas Turbine	L1-2	L2-2	Existing	[×]	80.910
ESB	PY_000030	PT_500024	GU_500041	Gas Turbine	L1-1		Existing	[×]	47.305
Energy Trading Ireland Limited	PY_000113	PT_500067	DSU_501510	Demand Side Unit	L1-1		Existing	[×]	0.197
Energy Trading Ireland Limited	PY_000113	PT_500067	DSU_501380	Demand Side Unit	L1-1		Existing	[×]	0.123
Energy Trading Ireland Limited	PY_000113	PT_500067	DSU_501600	Demand Side Unit	L1-1		Existing	[×]	0.070
Energy Trading Ireland Limited	PY_000113	PT_500067	DSU_501590	Demand Side Unit	L1-1		Existing	[×]	0.050
SSE Generation Ireland Limited	PY_000071	PT_400064	GU_400770	Gas Turbine	L1-2	L2-2	Existing	[×]	46.672
SSE Generation Ireland Limited	PY_000071	PT_400064	GU_400771	Gas Turbine	L1-2	L2-2	Existing	[×]	46.672
ESB	PY_000030	PT_500024	GU_500040	Gas Turbine	L1-1		Existing	[×]	351.115
SSE Generation Ireland Limited	PY_000071	PT_400064	GU_400780	Gas Turbine	L1-2	L2-2	Existing	[×]	46.852
SSE Generation Ireland Limited	PY_000071	PT_400064	GU_400781	Gas Turbine	L1-2	L2-2	Existing	[×]	46.852
ESB	PY_000030	PT_400030	GU_400325	Gas Turbine	L1-2	L2-1	Existing	[×]	202.170
ESB	PY_000030	PT_400030	GU_400324	Gas Turbine	L1-2	L2-1	Existing	[×]	202.170



Party Name	Party ID	Participant ID	CMU ID	Technology class	LCC Level 1	LCC Level 2	Capacity Type	Quantity offered (MW)	Quantity awarded (MW)
Lumcloon Power Limited	PY_034098	PT_402579	GU_404360	Other Storage	L1-2	L2-2	Existing	[×]	6.250
Lumcloon Power Limited	PY_034098	PT_402579	GU_404370	Other Storage	L1-2	L2-2	Existing	[×]	6.250
EnerNOC Ireland Ltd	PY_000088	PT_400090	DSU_401270	Demand Side Unit	L1-2	L2-2	Existing	[×]	2.223
EnerNOC Ireland Ltd	PY_000088	PT_400090	DSU_401610	Demand Side Unit	L1-2	L2-2	Existing	[×]	4.392
EnerNOC Ireland Ltd	PY_000088	PT_500098	DSU_501450	Demand Side Unit	L1-1		Existing	[×]	2.292
EnerNOC Ireland Ltd	PY_000088	PT_400090	DSU_403120	Demand Side Unit	L1-2	L2-2	Existing	[×]	1.005
Endeco Technologies Limited	PY_000126	PT_500099	DSU_503650	Demand Side Unit	L1-1		New	[×]	2.297
Ep Kilroot Limited	PY_000070	PT_500045	GU_500825	Gas Turbine	L1-1		Existing	[×]	26.368
Ep Kilroot Limited	PY_000070	PT_500045	GU_500824	Gas Turbine	L1-1		Existing	[×]	26.368
Endeco Technologies Limited	PY_000126	PT_400133	DSU_403690	Demand Side Unit	L1-2	L2-1	New	[×]	1.980
EnerNOC Ireland Ltd	PY_000088	PT_400090	DSU_401800	Demand Side Unit	L1-2	L2-1	Existing	[×]	5.948
EnerNOC Ireland Ltd	PY_000088	PT_400090	DSU_403020	Demand Side Unit	L1-2	L2-1	Existing	[×]	6.088
EnerNOC Ireland Ltd	PY_000088	PT_400090	DSU_403030	Demand Side Unit	L1-2	L2-1	Existing	[×]	6.421
Powerhouse Generation Limited	PY_000128	PT_500078	DSU_501330	Demand Side Unit	L1-1		New	[×]	2.263
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_400116	DSU_401400	Demand Side Unit	L1-2	L2-2	New	[×]	2.149
EnerNOC Ireland Ltd	PY_000088	PT_400090	DSU_403040	Demand Side Unit	L1-2	L2-1	Existing	[×]	6.434
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_400116	DSU_403520	Demand Side Unit	L1-2	L2-2	New	[×]	2.088
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_400116	DSU_403730	Demand Side Unit	L1-2	L2-1	New	[×]	4.713
Powerhouse Generation Limited	PY_000128	PT_400144	DSU_403500	Demand Side Unit	L1-2	L2-2	New	[×]	3.455
EnerNOC Ireland Ltd	PY_000088	PT_400090	DSU_401850	Demand Side Unit	L1-2	L2-2	Existing	[×]	6.028
EnerNOC Ireland Ltd	PY_000088	PT_400090	DSU_403050	Demand Side Unit	L1-2	L2-1	Existing	[×]	6.186
Cushaling Power	PY_000083	PT_400078	GU_405030	Other Storage	L1-2	L2-2	New	[×]	12.825
Cushaling Power Ltd	PY_000083	PT_400078	GU_401011	Gas Turbine	L1-2	L2-2	New	[×]	52.258
Cushaling Power Ltd	PY_000083	PT_400078	GU_401010	Gas Turbine	L1-2	L2-2	New	[×]	52.258
Cushaling Power Ltd	PY_000083	PT_400078	GU_405020	Gas Turbine	L1-2	L2-2	New	[×]	88.900
Endeco Technologies Limited	PY_000126	PT_500099	DSU_501460	Demand Side Unit	L1-1		Existing	[×]	2.410
Ep Kilroot Limited	PY_000070	PT_500045	GU_504020	Gas Turbine	L1-1		New	[×]	259.500
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_400116	DSU_402100	Demand Side Unit	L1-2	L2-2	Existing	[×]	1.755
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_400116	DSU_401870	Demand Side Unit	L1-2	L2-2	Existing	[×]	2.056



Party Name	Party ID	Participant ID	CMU ID	Technology class	LCC Level 1	LCC Level 2	Capacity Type	Quantity offered (MW)	Quantity awarded (MW)
Endeco Technologies Limited	PY_000126	PT_400133	DSU_401530	Demand Side Unit	L1-2	L2-2	New	[×]	0.885
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_400116	DSU_402120	Demand Side Unit	L1-2	L2-2	Existing	[×]	1.248
Electricity Exchange DAC t/a VIOTAS	PY_000114	PT_400116	DSU_401400	Demand Side Unit	L1-2	L2-2	New	[×]	2.149
Endeco Technologies Limited	PY_000126	PT_400133	DSU_402180	Demand Side Unit	L1-2	L2-2	Existing	[×]	0.535
Shannonbridge Power (B) Limited	PY_034115	PT_402593	GU_404650	Other Storage	L1-2	L2-2	New	[×]	9.101
Lumcloon Power Limited	PY_034098	PT_402579	GU_404360	Other Storage	L1-2	L2-2	New	[×]	24.700
Lumcloon Power Limited	PY_034098	PT_402579	GU_404370	Other Storage	L1-2	L2-2	New	[×]	24.700
EP Energy Developments Limited	PY_034119	PT_402597	GU_404740	Gas Turbine	L1-2	L2-2	New	[×]	40.615

## 3.2. CMUS PROVISIONALLY NOT AWARDED CAPACITY IN THIS CAPACITY AUCTION

The Participant listed in Table 3.6 submitted an offer for a CMU in the T-4 Auction but was not awarded any capacity.

Table 3.6: List of participants and CMUs provisionally awarded **no** capacity in the T-4 Capacity Auction for the Capacity Year 2025/26

Party Name	Party ID	Participant ID	CMU ID	Technology class	LCC Level 1	LCC Level 2	Capacity Type	Quantity offered (MW)	Quantity awarded (MW)
Powerhouse Generation Limited	PY_000128	PT_500078	GU_504080	Gas Turbine	L1-1		New	[×]	0.000

## 4. SUMMARY OF ISSUES IDENTIFIED WITH THE CAPACITY AUCTION PROCESS

We performed our role as Capacity Auction Monitor in relation to the 2025/26 T-4 Capacity Auction, which took place on 24<sup>th</sup> March 2022, in line with our obligations to monitor the conduct of the SOs in operating the Capacity Auctions. In Section 4.1, we summarise the identified instances of non-compliance within the areas of the CMC that are in the Monitor's scope, before presenting some additional considerations in Section 4.2.

## 4.1. SUMMARY OF ISSUES

In carrying out our duties, we identified 9 issues that we consider constitute non-compliance with the CMC, noting our obligation to report all issues to the RAs irrespective of materiality. The table below sets out a high-level summary of actual or potential instances of non-compliance identified within the Capacity Auction process. Detailed issue logs are included in Appendix B.

				6
Table 4.1: Summar	v ot issues identitie	d within the Ca	nacity Auction	nrocess <sup>o</sup>
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Issue Log	Description <sup>7</sup>
018	The SOs informed Participants of the outcome of the Applications for Review process, via email, after the deadline outlined in CMC E.9.3.5. Further, CMC E.9.3.6 requires the SOs to include, in the notification under E.9.3.5, the reasoning for the outcome. There was, however, one instance in which this was not provided.
020	CMC Section C.3 sets out the approach to calculating Initial Capacity. For several CMUs, the value of Initial Capacity in the FQRs does not align with the values calculated through the application of the formula outlined in the CMC.
021	CMC Section E.7.8 outlines the Alternative Qualification Process (AQP) which the SOs are to apply under certain circumstances. In the FQRs, the SOs did not apply this process in some instances in accordance with E.7.8.2.
023	CMC Section E.8.2 provides the formula to be used in the determination of Gross De-Rated Capacity of Generator Units and Interconnectors. For several Generator Units, the Gross De-Rated Capacity values within the Final Qualification Results (FQRs) do not align with the values calculated through the application of the formula outlined in this section.
024	CMC section E.8.5 outlines the approach to be undertaken in determining the Firm Offer Requirement for each Capacity Market Unit. The value in the FQRs for several Capacity Market Units does not align with the requirements in E.8.5.
025	CMC section E.8.7.1 outlines the approach to be undertaken in determining the Offer Price Caps for Existing and New Capacity for each CMU. For several CMUs the given Offer Price Caps in the FQRs do not align with the requirements in E.8.7.1.
030	The SOs are required under CMC E.9.4.11 to notify Market Participants where there has been change to the FQRs relative to the PQRs. We have identified a number of instances where there was a change to a value for "Accepted" candidates, but a code was not provided to detail the nature of the change(s).
032	The SOs submitted their Locational Capacity Constraint determinations to the RAs on 19th January 2022. However, the CMC requires these to be submitted to RAs no later than two Working Days after the Provisional Qualification Results Date, i.e., by 9th December 2021 for this auction.

<sup>6</sup> Issue numbers are assigned to potential instances of non-compliance as they are identified. Issue numbers missing from the table (e.g., Issue 017) may reflect issues investigated as part of the Monitor's Qualification Report for this Auction or may reflect issues that have been investigated and determined not to represent non-compliance with the CMC.

<sup>7</sup> For IL 020, 021 and 023, for at least one or more of these units, this issue was raised in an Issue Log of the Monitor's report on the 2025/26 T-4 Qualification Process. CMC E.9.4.2 requires the SOs to correct such PQR issues for the issuance of FQRs, but they did not do so in this case. See the particular Issue Logs in Appendix B for more details.

Issue Log	Description <sup>7</sup>
034	CMC F.4.1.6 stipulates that if, at FQRs, the value of the total quantity of Gross De-Rated Capacity (Total) across all qualified CMUs falls short of the LCC Required Quantity for the relevant LCC, then the SOs shall reduce the LCC Required Quantity for the LCC to the total quantity of Gross De-Rated Capacity (Total) across all qualified CMUs.
	The Gross De-Rated Capacity (total) that was successful in the FQRs falls short of the LCC Required Quantity for one LCC. The SOs have not satisfied F.4.1.6 by reducing the LCC Required Quantity for the LCC to the total quantity of Gross De-Rated Capacity.

## 4.2. FURTHER CONSIDERATIONS

This sub-section contains comments and observations that we believe do not represent non-compliance with the CMC, but we consider it appropriate to summarise for the RAs' attention.

## 4.2.1. Final Qualification Results

CMC E.9.5.1 requires the SOs to use "*reasonable endeavours*" to publish the FQRs on, or before, the Qualification Results Publication Date, set in the Capacity Auction Timetable as Tuesday 1<sup>st</sup> March 2022.

The SOs received FQR approval from the RAs on Wednesday 2<sup>nd</sup> March 2022 at 19:01. The results were published on the CMP on Thursday 3<sup>rd</sup> March 2022, and the SOs notified Participants of this, via email, at 20:43.

Given the information provided to us by the SOs, we have no reason to believe they have not taken reasonable endeavours to publish the FQRs once RA approval was received.

## 4.2.2. CMP Outage

On Tuesday 22<sup>nd</sup> March 2022 a Participant was not able to delete an offer submitted for the Capacity Auction on the CMP. This was raised with the SOs who reported the issue to the CMP vendor. On Wednesday 23<sup>rd</sup> March 2022, the CMP vendor prepared a solution to the rectify the issue which was then tested in the SAT environment. Once testing was complete, the SOs emailed the Participants on 23<sup>rd</sup> March 2022 at 16:50 to notify that an outage of the CMP would occur between 17:00 and 17:30, in order to implement the solution. The SOs then emailed Participants on 23<sup>rd</sup> March 2022 at 17:25 to advise that the outage was over. Following the outage, the SOs communicated with the affected Participant, who confirmed the CMP issue had been resolved.

The SOs have informed us that, as well as communicating this with the Participants, the RAs were also informed. Due to the time sensitive nature of the issue, the SOs noted that this communication took place via a direct phone call. An initial phone call took place to discuss the issue and possible contingencies, in the event it could not be rectified in advance of the Auction. Once the update had been completed, the SOs then notified the RAs, via phone call, that the CMP issue had been rectified and the Auction could proceed as scheduled.

Whilst this CMP outage does not represent non-compliance with the CMC, we consider it appropriate to summarise the issue for the RAs' attention.

### 4.2.3. Net Social Welfare

The objective of the SOs in clearing the Capacity Auction is to apply an appropriate auction methodology that maximises Net Social Welfare, to be calculated as per CMC F.8.4.2.

The SOs published the cumulative Net Social Welfare as part of the Provisional Auction Results. While we have not identified non-compliance with the application of F.8.4.2 when calculating Net Social Welfare in this Capacity Auction, we note that the cumulative Social Welfare (EUR) reported for the below CMUs in the Unconstrained Provisional Auction Results does not align with the methodology set out under CMC F.8.4.2, as shown in the table below.

$\begin{array}{ c c c c c c c c c c c c c c c c c c c$	CMU ID	Cumulative Social Welfare (EUR)	As calculated by Auction Monitor
$GU_{[X]}$ $[X]$ $[X]$ $DSU_{[X]}$ $[X]$ $[X]$ $DSU_{[X]}$ $[X]$ $[X]$ $GU_{[X]}$ $[X]$ $[X]$ $GU_{[X]}$ $[X]$ $[X]$ $GU_{[X]}$ $[X]$ $[X]$ $GU_{[X]}$ $[X]$ $[X]$ $DSU_{[X]}$ $[X]$ $[X]$ $DSU_{[X]}$ $[X]$ $[X]$ $DSU_{[X]}$ $[X]$ $[X]$ $DSU_{[X]}$ $[X]$ $[X]$ $GU_{[X]}$ $[X]$ $[X]$ $DSU_{[X]}$ $[X]$ $[X]$	I_[%]		
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$ \begin{array}{ c c c c c c c c c c c c c c c c c c c$	DSU_[≫]	[×]	[≫]
$ \begin{array}{ c c c c c c c c c c c c c c c c c c c$	DSU_[≫]	[×]	[≫]
$\begin{array}{ c c c c c c c c c c c c c c c c c c c$	GU_[≻]	[×]	[×]
$\begin{array}{ c c c c c c c c c c c c c c c c c c c$	GU_[≫]	[×]	[×]
$\begin{array}{ c c c c c c c c c c c c c c c c c c c$	DSU_[≫]	[×]	[×]
$\begin{array}{ c c c c c c c c c c c c c c c c c c c$	DSU_[≫]	[×]	[×]
$\begin{array}{ c c c c c c c c c c c c c c c c c c c$	DSU_[≫]	[×]	[×]
$\begin{array}{ c c c c c c c c c c c c c c c c c c c$	DSU_[≫]	[×]	[×]
$\begin{array}{c c c c c c c c c c c c c c c c c c c $	DSU_[≫]	[×]	[×]
GU_[X]       [X]       [X]         GU_[X]       [X]       [X]         DSU_[X]       [X]       [X]         DSU_[X]	GU_[⊁]	[×]	[×]
$\begin{array}{ c c c c c c c c c c c c c c c c c c c$	GU_[⊁]	[×]	[≯]
$\begin{array}{ c c c c c c c c c c c c c c c c c c c$	GU_[≻]	[×]	[×]
$\begin{array}{ c c c c c c c c c c c c c c c c c c c$	GU_[≫]	[×]	[×]
$\begin{array}{ c c c c c c c c c c c c c c c c c c c$	DSU_[≫]	[×]	[×]
$\begin{array}{ c c c c c c c c c c c c c c c c c c c$	DSU_[≫]	[×]	[×]
$\begin{array}{c c c c c c c c c c c c c c c c c c c $	DSU_[≫]	[×]	[≯]
$\begin{array}{c c} CAU_{[} [ \times ] & [ \times ] & [ \times ] \\ \\ DSU_{[} [ \times ] & [ \times ] & [ \times ] \\ \\ \\ DSU_{[} [ \times ] & [ \times ] & [ \times ] \\ \\ \\ \\ DSU_{[} [ \times ] & [ \times ] & [ \times ] \\ \\ \\ \\ \\ \\ DSU_{[} [ \times ] & [ \times ] & [ \times ] \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\$	DSU_[≫]	[×]	[×]
DSU_[X]       [X]       [X]         DSU_[X]	DSU_[≫]	[×]	[≯]
$\begin{array}{c c c c c c c c c c c c c c c c c c c $	CAU_[≫]	[×]	[≯]
$\begin{array}{c c c c c c c c c c c c c c c c c c c $	DSU_[≫]	[×]	[≯]
$\begin{array}{c c c c c c c c c c c c c c c c c c c $	DSU_[≫]	[×]	[×]
$\begin{array}{ c c c c c c c c c c c c c c c c c c c$	DSU_[≫]	[×]	[≯]
$\begin{array}{c c c c c c c c c c c c c c c c c c c $	DSU_[≫]	[×]	[≯]
$\begin{array}{c c c c c c c c c c c c c c c c c c c $	DSU_[≻]	[×]	[≯]
$\begin{array}{c c c c c c c c c c c c c c c c c c c $	DSU_[≫]	[≫]	[≫]
$\begin{array}{c c c c c c c c c c c c c c c c c c c $	DSU_[≫]	[×]	[≯]
$\begin{array}{c ccccccccccccccccccccccccccccccccccc$	DSU_[≫]	[≫]	[≫]
DSU_[X]     [X]     [X]       DSU_[X]     [X]     [X]       DSU_[X]     [X]     [X]       GU_[X]     [X]     [X]       GU_[X]     [X]     [X]	DSU_[≫]	[×]	[×]
DSU_[×]         [×]         [×]           DSU_[×]         [×]         [×]           GU_[×]         [×]         [×]           GU_[×]         [×]         [×]	DSU_[×]	[×]	[×]
DSU_[×]         [×]         [×]           GU_[×]         [×]         [×]           GU_[×]         [×]         [×]	DSU_[≫]	[⊁]	[×]
GU_[×]         [×]         [×]           GU_[×]         [×]         [×]	DSU_[×]	[×]	[×]
GU_[×] [×]	DSU_[≻]	[×]	[×]
	GU_[≻]	[×]	[×]
	GU_[≻]	[×]	[×]
GU_[≫] [≫] [≫]	GU_[⊁]	[×]	[×]

Table 4.2: Generator Units identified as not aligning with F.8.4.2
--

We note that this discrepancy appears to be due to rounding and has had no impact on the total Social Welfare (EUR) of the auction as a whole, as none of the identified CMUs are the price-quantity pair which sets the Auction Clearing Price. We do not consider this to be an instance of non-compliance with the CMC by the SOs; we provide this for information.

## 4.2.4. Applications for Review

The Capacity Auction Timetable (CAT V2.0 24/08/21) specified the date for the submission of Applications for Review (AfR) from Participants as 13<sup>th</sup> December 2021. The SOs however, emailed participants on 23<sup>rd</sup> December 2021 with a revised date for AfR of 7<sup>th</sup> January 2022.

The Participant included in the table below submitted an AfR after this date; however, it was still considered by the SOs.

Table 4.3: Applications for Review submitted after the deadline but considered by the SOs

Participant Name	Party ID	CMU_ID	Generator Unit	Date AfR was submitted
[×]	[×]	[×]	[×]	13/01/22

The Capacity Auction Timetable (CAT V2.0 24/08/21) also specified the SO date for requesting further information as 20<sup>th</sup> December 2021. The SOs, however, emailed participants on 23<sup>rd</sup> December 2021 revising the date for requesting further information to 11<sup>th</sup> January 2022.

The SOs requested further information regarding the six units in the table below, after this date.

Participant Name	Party ID	CMU_ID	Date SOs requested further information
[×]	[×]	[≫]	31/01/22
[×]	[×]	[≫]	24/01/2022

Table 4.4: SO requests for further information sent after the deadline.

CMC Section E.9.3 sets out SO requirements in relation to AfR. We do not consider the above this to be an instance of non-compliance with CMC Section E.9.3 by the SOs; we provide this for information.

## 4.2.5. Rounding

In accordance with L.5.4.1, the SOs are to use consistent numerical rounding for all published quantities in accordance with the decimal places detailed in the CMC. We note that our checks were conducted (where applicable) at the level of numerical rounding specified under CMC L.5.4 for calculations and published quantities. Additionally, the Final Auction Information Pack was checked for consistency with the numerical rounding specified for published quantities under CMC L.5.4.1. There were no rounding issues identified with respect to published quantities.

## 4.2.6. Chapter L: Data and information systems

Chapter L of the CMC sets out the SOs' requirements in relation to data and information systems, including communication between SOs and Participants, any system failures which affect the qualification or auction process, as well as publication of auction data in relation to the qualification or auction process. We do not monitor all communications between SOs and Participants, but rather rely primarily on the SOs and the RAs to notify us when issues arise.

This approach is typically supplemented by onsite monitoring during the auction process, although for this Auction the COVID-19 pandemic required that both the SOs and the Monitor teams work remotely. We have used conference calling and screen-sharing capabilities to best replicate our on-site visits.

Based on the information received to date, we did not identify any issues in relation to Chapter L.

## Appendix A SUMMARY OF WORK PERFORMED

We typically undertake a site visit for the day of Capacity Auction Submission End and Capacity Auction Run Start. For this Capacity Auction, the COVID-19 pandemic has resulted in travel restrictions that require that both the SOs and the Monitor teams work remotely. For this Auction, the RAs approved our approach of using conference calling and screen-sharing capabilities to best replicate our on-site visits.

The areas of the Code checked at the time of issuing this report are outlined in the table below.

Table A.1: Summary of CMC sections checked by the Monitor in preparing this report

CMC Chapter	CMC Subsection	CMC Paragraph
C. De-Rating and Capacity	C.2 Locational Capacity Constraints	C.2.1.2
Concepts	C.2 Locational Capacity Constraints	C.2.2.2
	C.2 Locational Capacity Constraints	C.2.3.1
	C.2 Locational Capacity Constraints	C.2.3.2
	C.3 Initial Capacity	C.3.2.1
	C.3 Initial Capacity	C.3.2.3
	C.3 Initial Capacity	C.3.5.1
D. Pre-Capacity Auction	D.2 Capacity Auctions and Timetables	D.2.1.5
Process		D.2.1.9
		D.2.1.10
		D.2.1.11
		D.2.1.14
		D.2.1.16
		D.2.1.17
E. Qualification	E.1 Purpose of Qualification Process	E.1.1.4
L. Quamouton	E.4 Application for Qualification	E.4.1.8
	E.5 Exception Applications	E.5.1.9
	E.8 Qualification Calculations	E.8.1.1
		E.8.1.2
		E.8.1.3
		E.8.2.1
		E.8.2.2
		E.8.2.4
		E.8.2.7
		E.8.2.8
		E.8.3.1
		E.8.4.1
		E.8.5.1
		E.8.5.2
		E.8.6.1
		E.8.7.1
		E.8.8.1
		E.8.8.2
		E.8.8.3
		E.8.9.1
		E.8.9.2
	E.9 Notification of Qualification Decisions	E.9.3.3
		E.9.3.5
		E.9.3.6

CMC Chapter	CMC Subsection	CMC Paragraph
E. Qualification	E.9 Notification of Qualification Decisions	E.9.4.1
		E.9.4.2
		E.9.4.3
		E.9.4.4
		E.9.4.9
		E.9.4.10
		E.9.4.11
		E.9.5.1
F. Capacity Auctions	F.1 General	F.1.2.2
	F.2. Capacity Auction Participation	F.2.1.1
	F.3 Demand Curve	F.3.1.1
		F.3.1.2
		F.3.1.6
		F.3.1.7
	F.4 Determination of Locational Capacity Constraints for a	F.4.1.1
	Capacity Auction	F.4.1.2
		F.4.1.4
		F.4.1.5
		F.4.1.6
		F.4.1.7
	F.5 Publication of Final	F.5.1.1
	F.5 Publication of Final	
		F.5.1.2
		F.5.1.3
	F.6 Capacity Auction Submissions	F.6.1.1
		F.6.2.1
	F.7 Capacity Auction Offers	F.7.1.1
		F.7.1.2
		F.7.1.3
	F.8 Conduct of Capacity Auction	F.8.1.1
		F.8.2.1
		F.8.2.2
		F.8.2.3
		F.8.3.2
		F.8.3.3
		F.8.3.4
		F.8.3.5
		F.8.4.2
		F.8.4.3
		F.8.4.4
		F.8.4.5
		F.8.4.6
		F.8.4.7
		F.8.5.1
		F.8.6.1
	E Q Canacity Austion Desults	
	F.9 Capacity Auction Results	F.9.1.1
		F.9.2.1
····		F.9.3.1
K. Exchange Rates	K.2 Methodology	K.2.1.6

CMC Chapter	CMC Subsection	CMC Paragraph
L. Data and Information	L.2 Methodology	L.2.2.2
Systems		L.2.3.1
		L.2.4.3
		L.2.4.4
		L.2.5.1
		L.2.5.2
		L.2.5.3
		L.2.5.4
		L.2.5.5
	L.3 Submission, Validation and Rejection of Data	L.3.1.1
	Transactions	L.3.1.3
		L.3.1.6
		L.3.1.7
		L.3.1.8
	L.4 Communications Failures	L.4.2.1
		L.4.2.3
		L.4.3.1
		L.4.3.3
		L.4.3.4
		L.4.4.2
		L.4.4.3
	L.5 Data Publication	L.5.4.1
M. Interim Arrangements	M.4 Interim Solutions for Conducting Capacity Auctions	M.4.1.3
		M.4.1.4
		M.4.1.7
	M.5 Locational Capacity Constraints	M.5.1.1
		M.5.1.2
	M.6 Alternative Auction Solution Methodology	M.6.1.2
		M.6.1.3
		M.6.1.5
		M.6.1.6
		M.6.1.7
	M.10 T-4 2023/24	M.10.1.2
		M.10.1.3

## Appendix B SUMMARIES OF OBSERVED ISSUES RESULTING FROM THE CAPACITY AUCTION PROCESS

## B.1. Issue Log 018

Issue ID	Affected auction(s)	Issue status	Compliance status
018	2025/2026 T-4 Capacity Auction	Closed	Non-compliant
Summary			

CMC E.9.3.5 outlines the deadline for notification of the outcome of the Application for Review process. The SOs informed Participants of the outcome of the Applications for Review process, via email, after the deadline. Further, CMC E.9.3.6 requires the SOs to include, in the notification under E.9.3.5, the reasoning for the outcome. There was, however, one instance in which this was not provided.

#### **Description of Issue**

CMC E.9.3.5 requires the SOs, within the Prescribed Timeframe of receiving an Application for Review, to notify the Participant lodging the application of the outcome. The *"Prescribed Timeframe"* means the timeframe specified in the Capacity Auction Timetable, which in this case was 12<sup>th</sup> January 2022.

The SOs notified Participants of the Application for Review outcomes **late** on  $18^{th}$  January 2022, with the exception of one notification issued on  $8^{th}$  February 2022 ([>]).

It is also noted that, due to the delay in issuing the Provisional Qualification Results, the SOs communicated a revised notification of outcome date of 17<sup>th</sup> January 2022 to the Participants via email on 23<sup>rd</sup> December 2021. Whilst this was not a timetable amendment approved by the RAs, nevertheless the SOs did not meet this revised deadline.

CMC E.9.3.6 (a) requires the SOs to include in their response under E.9.3.5 the reasons for the outcome of the Application for Review process. This was provided to all Participants apart from [ $\times$ ], in relation to [ $\times$ ], who received an email from the SOs containing notification that this CMU had now been qualified, but there was no reasoning provided alongside this outcome.

#### **Capacity Auction Monitor's Comments**

We consider this non-compliance with E.9.3.5 and E.9.3.6.

## **B.2.** Issue Log 020

Issue ID	Affected auction(s)	Issue status	Compliance status
020	2025/2026 T-4 Capacity Auction	Closed	Non-Compliant

#### Summary

CMC Section C.3 sets out the approach to calculating Initial Capacity. For several CMUs, the value of Initial Capacity in the FQRs does not align with the values calculated through the application of the formula outlined in this section.

For all Capacity Market Units identified in this issue log, we previously brought this issue to the SOs' attention – see Issue Log 014 of the Monitor's report on the 2025/26 T-4 Qualification Process. CMC E.9.4.2 requires the SOs to correct such PQR values for the issuance of FQRs but did not do so in this case.

#### **Description of Issue**

CMC C.3.2.1 (a) (i) states that for a Generator Unit, other than an Aggregated Generator Unit, Autoproducer Unit, or Demand Side Unit, that is the only Generator Unit at a single Connection point, the Initial Capacity (Existing) is the lesser of Registered Capacity and the Maximum Export Capacity.

For the below CMUs, the SOs have not set the Initial Capacity (Existing) equal to the lesser of the two (i.e., to the values shaded in orange in each row for ease of reference). The Registered Capacity and Maximum Export Capacity values were provided by the SOs to the Monitor.

CMU ID	Initial Capacity (Existing) (FQRs)	Registered Capacity (SOs)	Maximum Export Capacity (SOs)
[×]	[>>]	[×]	[×]
[×]	[>>]	[×]	[×]
[×]	[><]	[×]	[×]
[×]	[><]	[×]	[×]
[×]	[><]	[×]	[×]
[×]	[>>]	[×]	[×]
[×]	[><]	[×]	[×]
[×]	[><]	[×]	[×]

CMC C.3.2.1 (a) (ii) states that for a Generator Unit, other than an Aggregated Generator Unit, Autoproducer Unit, or Demand Side Unit, one of multiple Generator Units Connected at a single Connection Point, the Initial Capacity (Existing):

- A. does not exceed the Generator Unit's Registered Capacity; and
- B. when summed with the equivalent value across all Generator Units Connected at that Connection Point is equal to the lesser of:
  - i. the total Registered Capacity of all the Generator Units Connected at that Connection Point; and
  - ii. the Maximum Export Capacity.

For the below Generator Units, the Initial Capacity (Existing), is not less than, or equal to, the Generator Unit's Registered Capacity, as per C.3.2.1 (a) (ii) (A).

Generator Unit ID	Multi-Unit Connection Point	Initial Capacity (Existing) (FQRs)	Registered Capacity (Generator Unit)
[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]

For the below Generator Units, the Initial Capacity (Existing), is not the lesser of the total Registered Capacity and Maximum Export Capacity, as is required by C.3.2.1 (a) (ii) (B).

Generator Unit ID	Multi-Unit Connection Point	Initial Capacity (Existing)	Initial Capacity (Existing) (Multi-Unit)	Registered Capacity (Multi-Unit)	Maximum Export Capacity (Connection Point)
[×]	[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]	[×]
[×]	[≫]	[×]	[×]	[×]	[×]

CMC C.3.2.3 states that for a Generator Unit that is part of an Aggregated Generator Unit (AGU), the Initial Capacity (Existing) shall be its contribution to the Registered Capacity of the AGU. For the AGU listed in the below table, the sum of Initial Capacity (Existing) of the individual Generators does not equal the Registered Capacity of the AGU. This implies that the Initial Capacity (Existing) for the Generators that make up this AGU does not equal their contribution to the AGU's Registered Capacity.

Generator Unit ID	Generator ID	Existing Initial Capacity (PQRs and FQRs)	Sum of Initial Capacity (Existing) (PQRs and FQRs)	AGU Registered Capacity (SOs)
[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]
[×]	[≫]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]
[×]	[≫]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]

#### CMC E.8.1.2 states that:

"If the System Operators:

- (a) consider that a value determined under paragraph E.8.1.1 is inconsistent with the applicable Connection Agreement(s) or Connection Offer(s) (or, in the case of a Demand Side Unit, the unit's DSU MW Capacity or expected DSU MW Capacity);
- (b) consider that a value determined under paragraph E.8.1.1 in respect of Existing Capacity is inconsistent with the Registered Capacity, DSU MW Capacity or Effective Import Capacity of the relevant Generator Unit or Interconnector (or Generator contributing to an Aggregated Generator Unit) (as applicable); or
- (c) are applying the Alternative Qualification Process, then:

- (d) the System Operators shall determine the value of the Initial Capacity (Existing) and the Initial Capacity (Total) for the relevant Generator Unit or Interconnector (or a Generator contributing to an Aggregated Generator Unit) using the approach set out in section C.3 (as applicable) (but as modified in accordance with section C.3.5); and
- (e) the values so determined shall be used for the purposes of all calculations under this Code."

The SOs did not determine Initial Capacity values that were compliant for the above AGU and its Generators under E.8.1.2 part (d) above.

CMC C.3.5.1 highlights that the SOs should use these CMC sections when calculating the Initial Capacity.

CMC E.9.4.2 (c) states that any error in the PQRs that the SOs become aware of is to be corrected in the FQRs. This did not occur for the above Capacity Market Units, all of which we identified in Issue Log 014 of the Monitor's report on the 2025/26 T-4 Qualification Process.

**Capacity Auction Monitor's Comments** 

We consider this to be non-compliance with CMC C.3.2.1, C.3.2.3, C.3.5.1, E.8.1.2 and E.9.4.2.

## **B.3.** Issue Log 021

Issue ID	Affected auction(s)	Issue status	Compliance status
021	2025/2026 T-4 Capacity Auction	Closed	Non-compliant

#### Summary

Section E.7.8 of the CMC outlines the Alternative Qualification Process (AQP) which the SOs are to apply under certain circumstances. In the FQRs, the SOs have applied this process in some instances but not in accordance with E.7.8.2.

For a number of the Capacity Market Units in this issue log, highlighted in orange, we previously brought to the SOs' attention – see Issue Log 010 of the Monitor's report on the 2025/26 T-4 Qualification Process. CMC E.9.4.2 requires the SOs to correct such PQR issues for the issuance of FQRs but did not do so for these CMUs.

#### **Description of Issue**

CMC E.7.8.2 outlines requirements for the SOs when they are required to use the AQP to determine Qualification Decisions. In the remainder of this Issue Log, we highlight several Qualification Decisions that are non-compliant with requirements under E.7.8.2 (specifically parts d, h, and j of this CMC paragraph).

When applying the AQP, **CMC E.7.8.2 (d)(ii)** requires the SOs to qualify CMUs in respect of New Capacity only to the extent that it is Awarded New Capacity in a prior Capacity Auction. However, this is not the case for the below CMUs.

Generator Unit ID	<b>New Initial Capacity</b> (FQRs)	New Gross De-Rated Capacity (FQRs)	New Awarded Capacity (FQRs)
[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]
[×]	[>>]	[×]	[×]
[×]	[>>]	[×]	[×]
[×]	[>]	[×]	[×]
[×]	[>>]	[×]	[×]
[×]	[>>]	[×]	[×]
[×]	[×]	[×]	[×]
[×]	[>]	[×]	[×]
[×]	[>]	[×]	[×]
[×]	[>>]	[×]	[×]
[×]	[>>]	[×]	[×]
[×]	[×]	[×]	[×]
[×]	[>>]	[×]	[×]
[×]	[>>]	[×]	[×]
[×]	[×]	[×]	[⊁]

**CMC E.7.8.2 (h)** requires the SOs to, when applying the AQP, determine the Gross De-Rated Capacity (New) of the Capacity Market Unit, in the case of a Demand Side Unit or a Generator Unit referred to in paragraph E.2.1.1(e) that is a Variable Generator Unit, as the volume of any Awarded New Capacity associated with that unit for the Capacity Year (which may be zero). However, this is not the case for the below CMUs.

Generator Unit ID	New Gross De-Rated Capacity (FQRs)	New Awarded Capacity (FQRs)
[×]	[×]	[×]
[×]	[×]	[×]
[×]	[×]	[×]

[×]	[≫]	[×]
[×]	[×]	[×]
[×]	[≫]	[×]
[×]	[×]	[×]
[×]	[×]	[×]

**CMC E.7.8.2 (j)** requires the SOs to, when applying the AQP, set the Offer Price Cap for Existing Capacity as the Existing Capacity Price Cap ( $\in$ 46,150.00/£41,295.02) as per the Final Auction Information Pack. This has not been used for the below CMUs, where the SOs have applied the Auction Price Cap (of  $\in$ 146,920.00/£130,788.18 per MWh).

Generator Unit ID	Existing Price Cap (FQRs)
[×]	[×]
[×]	[×]
[×]	[×]
[×]	[×]
[×]	[×]
[×]	[×]
[×]	[×]
[×]	[×]
[×]	[×]
[×]	[×]
[×]	[×]
[×]	[×]
[×]	[×]

CMC E.9.4.2 (c) states that any error in the PQRs that the SOs become aware of is to be corrected in the FQRs. This did not occur for a number the above Capacity Market Units, highlighted in orange, which we identified in Issue Log 010 of the Monitor's report on the 2025/26 T-4 Qualification Process.

#### **Capacity Auction Monitor's Comments**

We consider this to be non-compliance with E.7.8.1, E.7.8.2 and E.9.4.2.

In response to non-compliance with E.7.8.2 (d)(ii) and (h), the SOs have stated that Gross De-Rated Capacity is the product of Initial Capacity multiplied by the applicable de-rating factor and is not an input variable to the CMP, where the Qualification Result calculations are undertaken. The SOs further note that "as the de-rated capacity for a unit can change between auctions as a result in changes to the de-rating factors, it may not be possible to make Gross De-Rated Capacity equal to Awarded Capacity without changing one of the values".

The Monitor checks for compliance against the current version of the CMC, with no areas holding higher importance, and therefore, consider the above units non-compliant with the present drafting. However, we feel it would be appropriate for the SOs and RAs to consider whether the CMC adequately represents what is appropriate and necessary regarding the Alternative Qualification Process.

## B.4. Issue Log 023

Issue ID	Affected auction(s)	Issue status	Compliance status
023	2025/2026 T-4 Capacity Auction	Closed	Non-compliant

#### Summary

CMC Section E.8.2 provides the formula to be used in the determination of Gross De-Rated Capacity of Generator Units and Interconnectors. For several Generator Units, the Gross De-Rated Capacity values within the Final Qualification Results (FQRs) do not align with the values calculated through the application of the formula outlined in this section.

For one of the Generator Units in this Issue Log, we previously brought this issue to the SOs' attention – see Issue Log 002 of the Monitor's report on the 2025/26 T-4 Qualification Process. CMC E.9.4.2 requires the SOs to correct such PQR values for the issuance of FQRs but did not do so in this case.

#### **Description of Issue**

CMC E.8.2.1 outlines the formula the SOs shall use to determine the Gross De-Rated Capacity (Existing) of a Generator Unit or Interconnector (other than an Aggregated Generator Unit) which is not a Variable Generator Unit.

For the below Generator Units, the Gross De-Rated Capacity (Existing) in the FQRs does not align with the value calculated by the Monitor, as per the formula in CMC E.8.2.1 using components from the FQRs and Participants Application for Qualification (AfQ).

Generator Unit ID	Existing Gross De- Rated Capacity (FQRs)	Calculated as per CMC E.8.2.1
[≫]	[≻]	[×]
[×]	[×]	[×]

We note that the Gross De-Rated Capacity (Existing) for both above Generator Units in the PQRs was compliant with E.9.2.1. However, the values in the FQRs have changed from those at the PQR stage following an update to the de-rating factor applied to these units.

CMC E.8.2.7 outlines the formula the SOs shall use to determine the Gross De-Rated Capacity (Existing) of an Aggregated Generator Unit. For the below unit, the Gross De-Rated Capacity (Existing) in the FQRs does not align with the aggregated value calculated by the Monitor, as per the formula in CMC E.8.2.7.

Generator Unit ID	Existing Gross De- Rated Capacity (FQRs)	Calculated as per CMC E.8.2.7
[×]	[×]	[×]

CMC E.9.4.2 (c) states that any error in the PQRs that the SOs become aware of is to be corrected in the FQRs. This did not occur for [ $\gg$ ] which we identified in Issue Log 002 of the Monitor's report on the 2025/26 T-4 Qualification Process. The value for this CMU in the FQRs has not changed from the PQRs.

**Capacity Auction Monitor's Comments** 

We consider this to be non-compliance with CMC E.8.2.1, E.8.2.7 and E.9.4.2.

## B.5. Issue Log 024

Issue ID	Affected auction(s)	Issue status	Compliance status
024	2025/2026 T-4 Capacity Auction	Closed	Non-compliant
Summary			

CMC section E.8.5 stipulates the approach to be undertaken in determining the Firm Offer Requirement for each Capacity Market Unit. The value in the FQRs for several Capacity Market Units does not align with the requirements in E.8.5.

#### **Description of Issue**

CMC E.8.5.1 states that for a Capacity Market Unit, that is not a Demand Side Unit, the Firm Offer Requirement is the lesser of:

- a) the sum of Net De-Rated Capacity (Existing) and Net De-Rated Capacity (New); and
- b) the greater of zero and De-Rated Firm Network Access Capacity less Awarded Capacity.

For the below Capacity Market Units, the Firm Offer Requirement is not the lesser of parts a) and b).

CMU ID	E.8.5.1 (a)	E.8.5.1 (b)	Min of (a) and (b)	Net Firm Offer Requirement (FQRs)
[×]	[×]	[×]	[×]	[×]
[×]	[×]	[×]	[×]	[×]

We note that the Firm Offer Requirement for the above Capacity Market Units in the PQRs was compliant with E.8.5.1. However, the values in the FQRs have changed from those at the PQR stage.

CMC E.8.5.2 states that for a Demand Side Unit the Firm Offer Requirement is the sum of the Net De-Rated Capacity (Existing) and Net De-Rated Capacity (New). For the below Demand Side Unit, this is not reflected in the FQRs.

CMU ID	Net Firm Offer	Existing Net De-	New Net De-Rated	Sum of Existing
	Requirement	Rated Capacity	Capacity	and New
	(FQRs)	(FQRs)	(FQRs)	(Calc)
[×]	[⊁	] [×]	[×]	[×]

We note that the Firm Offer Requirement for the above Demand Side Unit in the PQRs was compliant with E.8.5.2. However, the value in the FQRs has changed from that at the PQR stage.

#### **Capacity Auction Monitor's Comments**

We consider this to be non-compliance with E.8.5.1 and E.8.5.2.

## **B.6.** Issue Log 025

Issue ID	Affected auction(s)	Issue status	Compliance status
025	2025/2026 T-4 Capacity Auction	Closed	Non-compliant
Summarv			

CMC section E.8.7.1 outlines the approach to be undertaken in determining the Offer Price Caps for Existing and New Capacity for each CMU. For several CMUs the Offer Price Caps in the FQRs do not align with the requirements in E.8.7.1.

**Description of Issue** 

#### DSU CMUs

CMC E.8.7.1 (a) states that the Offer Price Cap for New Capacity shall be the Auction Price Cap, which the FAIP states as  $\leq 146,920.00/\pm 130,788.18$  per MWh. For the CMUs in the below table, the SOs have applied the Existing Capacity Price Cap ( $\leq 46,150.00/\pm 41,295.02$ ) to New Capacity, also set out in the FAIP. All of these CMUs have a New Net De-Rated Capacity of 0MW and none submitted an offer for the 2025/26 T-4 Auction.

Table A: DSUs that were given an incorrect (too low) Offer Price Cap in the FQRs

CMU ID	Offer Price Cap for New Capacity (FQRs) (£/MWh)	Price cap for DSUs – the Auction Price Cap (£/MWh)
[×]	[≫]	[≻]
[×]	[≫]	[≻]
[×]	[≫]	[≻]
[×]	[≫]	[≻]
[×]	[×]	[×]

### Other CMUs

CMC E.8.7.1 (c) (iii) states that for all CMUs, other than DSUs, where the RAs have not approved a Unit Specific Price Cap (USPC) for Existing Capacity, then the Offer Price Cap for Existing Capacity shall be the Existing Capacity Price Cap. For the CMU in Table B, the SOs applied the Auction Price Cap (of €146,920.00/£130,788.18 per MWh) to its Existing Capacity, rather than the appropriate Existing Capacity Price

€146,920.00/£130,788.18 per MWh) to its Existing Capacity, rather than the appropriate Existing Capacity Price Cap of €46,150.00/£41,295.02 per MWh. This CMU has an Existing Net De-Rated Capacity of 0MW and did not submit any offers related to Existing Capacity into the 2025/26 T-4 Auction.

Table B: CMUs that were given an incorrect (too high) Offer Price Cap in the FQRs

CMU ID	Existing Price Cap (FQRs) (£/MWh)	Price cap for CMUs (not DSUs) without a USPC (£/MWh)	
[≫]	[>	<] [×	]

### Capacity Auction Monitor's Comments

We consider this to be non-compliance with E.8.7.1.

We note that, whilst the Price Caps for the above units in the FQRs do not align with the requirements of E.8.7.1, there is no impact on the Capacity Auction as none of the affected CMUs had any Net De-Rated Capacity for the Price Cap in question and therefore, would not have any capacity to offer into the Auction.

## **B.7.** Issue Log 030

Issue ID	Affected auction(s)	Issue status	Compliance status		
030	2025/2026 T-4 Capacity Auction	Closed	Non-compliant		
Summary					

The SOs are required under CMC E.9.4.11 to notify Market Participants where there has been change to the FQRs relative to the PQRs. We have identified a number of instances where there was a change to a value for "Accepted" candidates, but a code was not provided to detail the nature of the change(s).

#### **Description of Issue**

CMC E.9.4.11 states that, where an FQR has changed relative to a PQR, the SOs shall include both the provisional and final decision, or value, so as to identify to the Participant what has changed.

In practice, Participants can access the provisional and final decisions on separate views in the Capacity Market Platform (CMP), and changes between the two are identified with 'qualification results notes' added onto the FQRs as displayed in the CMP (e.g., IC\_AMEND).

For the following Generator Units, the SOs did not include an Amend Code in the FQRs, even though changes were made between the PQRs and FQRs.

Generator Unit ID	Change in	PQR value	lue FQR value	
[×]	Net Firm Offer Requirement	[×]	[×]	
[×]	Clean Status	[×]	[×]	
[×]	Clean Status	[×]	[×]	
[×]	Minimum Firm Transmission Capacity	[×]	[×]	
[×]	Minimum Firm Transmission Capacity	[×]	[×]	
[×]	Net Firm Offer Requirement	[×]	[×]	
[×]	Existing Net De-Rated Capacity	[×]	[×]	
[×]	Net Firm Offer Requirement	[×]	[×]	
[×]	Existing Net De-Rated Capacity	[×]	[×]	
[×]	Net Firm Offer Requirement	[×]	[×]	
[×]	Existing Net De-Rated Capacity	[×]	[×]	
[×]	Net Firm Offer Requirement	[×]	[×]	
[×]	Existing Net De-Rated Capacity	[×]	[×]	
[×]	Net Firm Offer Requirement	[×]	[×]	
i×i	Existing Net De-Rated Capacity	i×i	i×i	
[×]	Net Firm Offer Requirement			
[×]	Existing Net De-Rated Capacity	i×i	[×]	
[×]	Net Firm Offer Requirement	[×]	[×]	
i×i	Existing Net De-Rated Capacity	i×i	[×]	
[×]	Net Firm Offer Requirement		[×]	
i×i	Existing Net De-Rated Capacity	i×i	[×]	
[×]	New Awarded Capacity	[×]	[×]	
i×i	New Net De-Rated Capacity	i×i	i×i	
[×]	New Awarded Capacity	[×]	[×]	
i×i	New Net De-Rated Capacity	i×i	[×]	
[×]	New Awarded Capacity	[×]	[×]	
[×]	New Net De-Rated Capacity	i×i	[×]	
[×]	New Awarded Capacity	[×]	[×]	
[×]	New Net De-Rated Capacity	[×]	[×]	
[×]	New Awarded Capacity	[×]	[×]	
[×]	New Net De-Rated Capacity	[×]	[×]	
	Net Firm Offer Requirement			
[×]	Existing Net De-Rated Capacity	[×]	[×]	
	Gross Firm Offer Requirement	[×]	[×]	

	Net Firm Offer Requirement	[×]	[×]	
[×]	Minimum Firm Transmission Capacity	[≫]	[×]	
[×]	Net Firm Offer Requirement	[×]	[×]	
[≫]	Existing Net De-Rated Capacity	[≫]	[×]	
[×]	Net Firm Offer Requirement	[×]	[×]	
[≫]	New Awarded Capacity	[≫]	[×]	
[×]	New Net De-Rated Capacity	[≫]	[≫]	
[×]	Gross Firm Offer Requirement	[⊁]	[⊁]	
[×]	Net Firm Offer Requirement	[≫]	[×]	
[×]	New Awarded Capacity	[≫]	[≫]	
[×]	New Maximum Capacity Duration	[≫]	[×]	
[×]	New Net De-Rated Capacity	[≫]	[×]	
[×]	New Initial Capacity	[⊁]	[⊁]	
[×]	New De-Rating Factor	[≫]	[×]	
	New Gross De-Rated Capacity	[≫]	[×]	
	New Nominated De-Rated Capacity	[≫]	[×]	
	New Net De-Rated Capacity	[×]	[×]	

This represents non-compliance with E.9.4.11.

We have previously discussed the approach to E.9.4.11 in our Auction Report for: T-4 2022/23 (Issue Log 011); T-4 2023/24 (Issue Log 015); T-1 2022/23 (Issue Log 015); T-3 2024/25 (Issue Log 027).

## **B.8.** Issue Log 032

Issue ID	Affected auction(s)	Issue status	Compliance status
032	2025/2026 T-4 Capacity Auction	Closed	Non-compliant
Summary			

The SOs submitted their Locational Capacity Constraint determinations to the RAs on 19<sup>th</sup> January 2022. The CMC, however, required these to be submitted to the RAs no later than two Working Days after the Provisional Qualification Results Date of 9<sup>th</sup> December 2021.

#### **Description of Issue**

CMC F.4.1.4 requires the SOs to submit the Locational Capacity Constraint determinations, as per F.4.1.1, to the RAs no later than two working days after the Provisional Qualification Results date.

The Provisional Qualification Results date specified in the Capacity Auction Timetable (CAT V2.0) was 9<sup>th</sup> December 2021 but, the Provisional Qualification Results were not published until 23<sup>rd</sup> December 2021. The SOs submitted their determinations to the RAs, via email, on 19<sup>th</sup> January 2022, more than two working days after the Provisional Qualification Results date in the CAT, and the publication on 23<sup>rd</sup> December 2021.

#### **Capacity Auction Monitor's Comments**

We consider this to be non-compliant with F.4.1.4.

## B.9. Issue Log 034

Issue ID	Affected auction(s)	Issue status	Compliance status
034	2025/2026 T-4 Capacity Auction	Closed	Non-compliant

#### Summary

CMC F.4.1.6 stipulates that if, at FQRs, the value of the total quantity of Gross De-Rated Capacity (Total) across all qualified CMUs falls short of the LCC Required Quantity for the relevant LCC, then the SOs shall reduce the LCC Required Quantity for the LCC to the total quantity of Gross De-Rated Capacity (Total) across all qualified CMUs.

The Gross De-Rated Capacity (total) that was successful in the FQRs falls short of the LCC Required Quantity for one LCC. The SOs have not satisfied F.4.1.6 by reducing the LCC Required Quantity for the LCC to the total quantity of Gross De-Rated Capacity.

#### **Description of Issue**

CMC F.4.1.1 (b) stipulates that the SOs should determine the total quantity of Gross De-Rated Capacity, in respect to CMUs which are Qualified as contributing to an LCC.

CMC F.4.1.1 (c) requires the SOs to determine the absolute amount by which the total quantity determined under CMC F.4.1.1 (b) falls short of the LCC Required Quantity for the LCC.

Having already developed these values after PQR, the SOs are again required to update these values at FQRs – in CMC F.4.1.5.

The SOs submitted the LCC Required Quantities for the FAIP to the RAs on 21<sup>st</sup> February 2022. We have identified that, based on the values determined by the SOs, the amount calculated under CMC F.4.1.1 (c) is greater than zero (i.e., there is shortfall) for L2-1: Dublin, as shown in the table below.

Table 1: The LCC Required Quantities as calculated by the SOs under F.4.1.1 (C) and submitted to the RAs.

Quantity (GW)	L1-2: Ireland	L1-1: Northern Ireland	L2-1: Dublin	L2-2: Rest of Ireland
A. GDRC (Total) that was successful in the FQRs	6.843	2.844	2.418	4.424
B. LCC Required Quantity determined by the SOs	6.733	1.914	2.605	3.543
Difference (B-A)*	0.110	0.930	-0.187	0.881

Note: Values rounded to 3 d.p

\* A negative number means that GDRC is greater than the LCC Required Quantity so there is no shortfall

CMC F.4.1.6 states that if the SOs based on FQRs, find that the value under CMC F.4.1.1 (c) is greater than zero, then the SOs shall reduce the LCC Required quantity for the LCC to the total quantity determined under CMC F.4.1.1 (b). This should have occurred for L2-1.

The SOs have confirmed that, despite determining a value greater than 0.000 MW for LCC area L2-1, they did not reduce the Required Quantity to the total quantity determined under CMC F.4.1.1 (b), as required by F.4.1.6.

The SOs noted that the "LCC Required Quantity was not reduced as the values submitted to the RAs are subject to approval by the RAs and until such time as the values are approved, it is not possible to determine whether there would in fact be a shortfall". The SOs further stated that they did not want to send anything to the RAs that understated the required capacity quantities and that it is "the responsibility of the RAs to determine the LCC Required Quantities for each Capacity Auction".

#### **Capacity Auction Monitor's Comments**

We consider this to be non-compliance with CMC F.4.1.6.

We note that a similar issue was raised in the Monitor's report on the 2022/23 T-1 Auction Process and the 2024/25 T-3 Auction Process. As a repeated issue, it would be appropriate for the SOs and RAs to consider whether the CMC adequately represents what is appropriate and necessary for the process of updating of LCCs following FQRs.



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