

Kieran,

With reference to the above, I attach comments from Electric Ireland on the proposed modification

Draft Code Modification Proposal A074 referring to the proposed amendments to daily imbalance charges

Further to the issues outlined below on 17th June, we also have concerns that:

- The specific concerns relating to the consideration of impacts of the proposed change particularly on those end users who don't have visibility of the data to modify their consumption patterns
- The time-line for implementation is unrealistic in terms of the required changes to systems
- There is no time allocated to allow customers to alter their behaviour before being penalised.
- Other than presenting our concerns on slides, there was no evidence our submission had been considered or incorporated
- There were no responses given our previously raised concerns

We wish to re-state our concerns in relation to the proposal and :

With reference to the Actions from Balancing Workshop 1/6/16

With reference to action 3 in the Balancing Workshop Meeting Notes 1 June 2016, Electric Ireland wishes to make the following comments

1. The balancing penalty proposed appears to be penal when considered in the context of the end DM and LDM customers. Those customers who work with us to accurately nominate to ensure our overall nominations are in balance will now see an increase in disproportionately increased imbalance charge due largely to the action of other market participants. We would like to propose that this proportionality in terms of balance responsibility is accurately represented in any final approved solution in this matter.
2. It should be noted that suppliers with a DM customer base only receive consumption information on a D+1 basis whereas larger power participants have greater visibility on an hourly basis i.e. we have no within day capability to monitor consumption to provide the opportunity to correct imbalances.
3. With reference to market rules, where daily allocation reads can be adjusted up to D+5, leading to a material level of uncertainty as regards actual allocations, causes greater challenges for ongoing daily and weekly forecasting by the shipper. This in effect means that there is a greater chance that we will be out of balance through circumstances which are uncontrollable by us as a shipper.
4. Our preference in this matter would be for better (i.e. less adjusted reads) and earlier information to allow us to forecast with a greater deal of accuracy and also to allow for imbalance to be more correctly apportioned.

It should be noted that our priorities in this matter are 1 and 2, in that order. These issues are compounded by the matters referred to in 3 and 4.

Regards

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