

**Power NI Energy Limited
Power Procurement Business (PPB)**

**Imperfections Charges
For
October 2012 – September 2013**

Consultation Paper

SEM-12-045

Response by Power NI Energy (PPB)



16 July 2012.

Introduction

Power NI Energy – Power Procurement Business (“PPB”) welcomes the opportunity to respond to the consultation paper on Imperfections Charges for October 2012 – September 2013.

Comments

PPB cannot comment on the derivation of estimated amounts and therefore can only comment on the principles. We agree that the estimated Dispatch Balancing costs, Make Whole Payment and Others System Charges be recovered in full through the Imperfections charge in the coming tariff period. However, we note that the input data freeze for the PLEXOS modelling occurred on 29 February 2012, four months before this consultation period. PPB believes that this data freeze should occur as close to the tariff year as possible. This would also allow the modelling to be performed with the latest verified PLEXOS model and generator data set.

PPB agrees that the current K Factor mechanism be continued in the new tariff period and we believe that the final approved tariff should include a latest “K” estimate.