

[By email]

Clive Bowers
Commission for Energy Regulation

11 July 2012

Terms of Reference for the Market Audit 2012 - Consultation SEM-12-041

Dear Clive,

Thank you for this opportunity to briefly respond to the above.

Intra-day trading (IDT) will be an integral part of SEM design that should be included within the scope of the Market Audit as a matter of course. IDT is also a key risk area that is being delivered within a tight timeline and we understand that many participants including the market have experienced issues with the new functionality required in their systems. Option 3 should thus be included within the TOR for the 2012 market audit.

However there is a continued need for the ongoing audit work with MDP organisations as discussed in Option 2 and this should be incorporated into the audit in conjunction with Option 3.

Please do not hesitate to contact us if you would like to discuss further.

Yours sincerely



Kevin Hannaifn
Regulation Manager