

## **IWEA submission on Trading and Settlement Code Operational Parameters 2013**

The Irish Wind Energy Association (IWEA) welcomes the opportunity to respond to the SEM Committee Consultation on the TSC Operational Parameters 2013.

### **Flattening Power Factor**

The current paper requests comments on the value of the flattening power factor. In our response to the CPM Medium Term Review IWEA noted that we are opposed to an increase in the power factor. An increase in FPF increases the volatility of Ex Post capacity payments. It also increases the exposure of not being available and has the effect of putting more capacity payments into periods when the wind does not blow. Such an increase would affect the revenue risk of all generators but particularly wind farm generators. IWEA is opposed to increasing the FPF, as this is particularly discriminatory against wind capacity. IWEA also notes that increasing risks for investors at this stage is particularly unsatisfactory considering the uncertainty that is currently faced by investors as a result of regional integration.

IWEA supports the TSO proposal that the FPF is not changed at this time and that the same value (0.35) for the FPF in 2013 as in 2012 be maintained.