

Elaine Gallagher
Commission for Energy Regulation
The Exchange
Tallaght
Dublin 24

4th Sept 2013

Re: Trading and Settlement Code Policy Parameters 2014 Consultation Paper (SEM-13-053)

Dear Elaine,

Bord na Móna (BnM) welcomes the opportunity to respond to the above consultation paper on Trading and Settlement Code Policy Parameters 2014.

BnM is not in favour of changing PCAP to €1,200/MWh. BnM is of the opinion that there is no justification for such a change given that the increase is being proposed following an isolated PCAP event. As outlined in the consultation paper, there was a cumulative series of independent events which resulted in a large uplift component contributing to SMP > PCAP for a single trading period. This was the first occurrence of a PCAP event in approximately 100,000 trading periods. Notwithstanding the effect that any amendment to PCAP would have on the ACPS, BnM believes there is no statistical basis which can be used to rationalise a change to the existing PCAP value.

BnM supports the proposal to maintain PFLOOR at minus €100/MWh.

BnM believe that more detailed studies and analysis (over a longer time span) for the uplift parameters needs to be completed and published prior to, or in parallel with, any consultation process being commenced to consider the merits of changing the existing values.

Kind regards, for and on behalf of Bord na Móna Powergen,



Dr John MacNamara
Commercial & Regulatory Affairs Manager