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Dear Brian, Robert,

**RE: BGE Response to the '*Minded to Decision Paper*' on the "Process for the Calculation of Outturn Availability"**

Bord Gáis Energy (BGE) welcomes this opportunity to respond to the Regulatory Authorities' (RAs) *Minded to Decision Paper* on the process for the calculation of outturn availability. Whereby BGE had advocated for generator remuneration of 100% of all outages in its initial response, BGE recognises the balance that the RAs have sought to achieve in minimising the cost to the customer while attempting to provide incentives to manage the outage process effectively. However, BGE believes greater balance could still be achieved in ensuring that those who can best plan and manage outages work in good faith with system users in order to ensure that outages are minimised.

The *Minded to Decision* paper effectively hinges on the provision of annual maintenance outages lasting up to and including five business days. BGE believes that as part of the final decision, the RAs should define "annual maintenance outages" and that a governance document outlining what constitutes annual maintenance and the length of time for different types of annual maintenance should be provided. This should be benchmarked against outage durations of other TSOs and should be audited and assessed independently by technical experts.

The CER refers to the need for modifications to the Grid Code and Trading & Settlement Code. BGE believes it would be useful if the CER could clarify in its decision paper what modifications would be required to each and provide a specific work programme for each of the relevant Committees to expedite the process and implement the decision paper at the soonest possible juncture.

BGE welcomes the provisions with respect to planning and managing the outage planning process. Generators have both the commercial incentive and the technical obligation under the Grid Code to provide prior notice to the TSOs of its planned outages over a 3 year period. However, generators do not have the ability to manage the risk of scheduling. In designing/approving this process, BGE believes that while also providing flexibility to practically manage the dynamic nature of generators and system operators, information, transparency and co-operation will also be key in this regard. The TSOs and generators must build a relationship of trust if all parties are to optimise the outage scheduling process and implement the aims of this *Minded to Decision* paper.

I hope you find the above comments helpful and should you have any queries, please do not hesitate to contact me.

Sincere regards,

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Brian Larkin  
Regulatory Affairs – Commercial  
Bord Gáis Energy

{By email}