

Submission by Bord na Móna PowerGen

to the

Regulatory Authorities' Minded-To Decision Paper

on the

*Process for the Calculation of Outturn Availability*

*(SEM – 15 – 014)*

9<sup>th</sup> April 2015

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## Introduction

Bord na Móna (BnM) welcomes the opportunity to respond to the Regulatory Authorities' (RAs) Minded-to Decision Paper on the Process for the Calculation of Outturn Availability (SEM-15-014). In the first instance it must be clearly stated that BnM fully support the RA's objective of developing an all island harmonised policy setting out in a clear, transparent and non-discriminatory manner how Outturn Availability should be determined. Secondly, Bord na Móna reiterates its earlier position that *a priori* the current market design is such that generators should receive constraint payments and capacity payments when they are technically 'available' – and believe therefore that Option 2 as outlined in the TSO's earlier consultation paper should be the basis of determining 'outturn availability'.

However, Bord na Móna, appreciates the role of and responsibilities on the RAs and acknowledges that that current 'Minded to' paper can be seen as somewhat of a compromise between TSO/TAO and Generators from the viewpoint of the consumer. In this regard, but notwithstanding our continued principled support for the original 'Option 2', BnM wish to avail of this opportunity to make constructive suggestions and enhancements to the proposed decisions detailed in the 'Minded to' paper.

## Definition of Availability and Outturn Availability

Leaving aside BnM principled support for the original 'Option 2', and addressing the RA's proposed decision as to the methodology to define 'Availability' and 'Outturn Availability', Bord na Móna can see merit in using the existing Grid Code Review Panels and Modifications Committee as the forum to effect the changes.

## RAs recommended arrangement for the calculation of Outturn Availability

Assuming that the general direction of travel outlined in the current consultation, separately defining 'availability and outturn availability' are ratified, then there may be scope to ensure that the methodology for calculating 'outturn availability' is delivered in a manner which is clear, transparent and non-discriminatory as well as being an incentive on both generators and TSO/TAO alike.

In particular, the proposed decision of allowing up to '5 business days' for scheduled annual outages would appear to be too blunt an approach. Bord na Móna would be of the opinion that

- Qualifying annual outage schedules with 'business days' is somewhat incongruous given that the supply of electricity is a 24/7 activity
- 5 days appears to be an arbitrary figure, which on first instance seems to be quite conservative

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Bord na Móna suggests using ‘**trading periods**’ as the time unit for defining the length of scheduled annual maintenance outages; and that until, as suggested in the ‘Minded to’ paper, a schedule of different maintenance outage durations are defined and agreed by all parties, the default annual maintenance outage (where generators’ outturn availability is set to zero) should be limited to ‘120 trading periods’.

### **Outage Planning**

To date Bord na Móna has had a positive and professional experience when engaging with the TSO regarding the planning and aligning of outages.

Bord na Móna sees merit in the RA’s proposal to further increase lines of communications between participants.

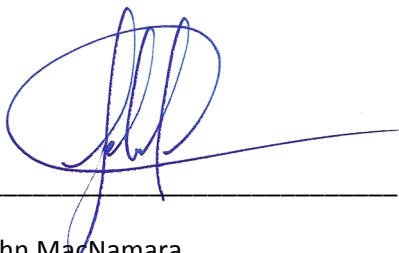
Bord na Móna also welcomes the proposal for an *ex post* summary report at the end of each outage season; in addition to reporting on the outage time for each of the ‘work packages’ compared against the pre-determined targets, each report should ideally **include updated international best practice durations** for each of the general types of outages carried out during that outage season.

### **Temporary Connection Assets & Extensions to or changes at existing connections**

Bord na Móna notes the ‘Minded to’ position of the RAs in respect of Temporary Connections and broadly welcomes the proposed decision of differentiating generators that share a common transmission asset when work is being carried out on one generator’s connection point.

Should you require clarification on any of the proposals do not hesitate to contact myself.

For and on behalf of Bord na Móna PowerGen,



John MacNamara

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