Power NI Energy Limited
Power Procurement Business (PPB)

Process for the Calculation of Outturn Availability

RAs Minded to Decision Paper

Response by Power NI Energy (PPB)

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Power Procurement Business

Introduction

Power NI Energy – Power Procurement Business ("PPB") welcomes the opportunity to respond to the Regulatory Authorities Minded to Decision Paper on the Process for the Calculation of Outturn Availability.

Comments on the RAs "Minded to Decision"

PPB agrees that the current custom and practice in Northern Ireland for generators should remain for legacy arrangements. However, the decision that all generators connected at the "new" position should be treated differently and lose availability payments during some transmission outages is discriminatory and, as we highlighted in our March 2013 response to the TSOs, does not reflect the SEM High Level Design. Any proposal to adjust the availability of generating units to reflect outages on connection assets or the network infrastructure beyond that would conflict with the High Level Design principles of the SEM which provides that the market schedule is based on the unconstrained availability of generating units. The TSC reflects this HLD principle.

The RAs response to Option 2 in section 4.2 recognises that overall costs for consumers may be lower although it fails to note the further benefit that the Dispatch Balancing costs are transparent and can be incentivised to seek to ensure the TSO works to align outages given they have the most control over outage planning. The response also incorrectly states that there is no incentive on generation plant to align outages. In NI, the TSO has significant powers under the Grid Code OC2 to move generator outage requests both during the outage planning process and in real time. This again highlights that the TSO has the most control and influence on all the relevant parties and hence it is unreasonable to seek to impose additional risk on the generators.

The minded to decision also discriminates against generators who do not require an outage but yet have the potential to be penalised under this decision as they would not have any outage to align with the Transmission Outage.

Further, if the proposals are implemented as outlined in the minded to paper, it is unclear what the outcome would be for a generator if the Transmission Outage is moved even though the generator has committed to the original dates. The generator should not be subject to any loss of availability (or loss incurred to move their outage if that were possible) in such circumstances.

PPB agrees that Transmission Outages should to subject to more transparent planning which are timely and efficient. This could be achieved if the Transmission system had to adhere to the same long and short term planning process as generators under Grid Code OC2.

Conclusion

PPB considers that, as at present, all generators' availability should reflect the Grid Code declarations and be based on the availability of assets that are fully under the control of the generator and which is not dependent on third party actions or activity.