
Brookfield Renewable

Response to SEM-17-009: I-SEM Operational Parameters Credit Cover and Imbalance Settlement Consultation Paper

Submission Date: 20 March 2017



Brookfield

Sheena Byrne
Commission for Energy Regulation
The Exchange
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Kenny Dane
Northern Ireland Utility Regulator
Queens House
14 Queen Street
Belfast
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Date: 20 March 2017

RE: SEM-17-009: I-SEM Operational Parameters Credit Cover and Imbalance Settlement

Dear Sirs,

Brookfield Renewable welcome the opportunity to provide feedback on the I-SEM Operational Parameters Credit Cover and Imbalance Settlement consultation paper published by the SEM Committee, who comprise of both the Northern Ireland Utility Regulator and the Commission for Energy Regulation (the RAs).

Brookfield Renewable Ireland is part of Brookfield Renewable Partners L.P., one of the largest publicly-traded pure-play renewable power platforms globally with over 10,700 MW of hydroelectric and wind capacity across 15 power markets and in excess of 470 MW of operating wind capacity with a 200 MW wind development pipeline in Ireland. Our power operating platform employs over 2,200 people globally, including full operating, development, construction oversight, and wholesale power marketing capabilities. In addition to operating a wind portfolio in the Single Electricity Market, Brookfield Renewable also actively trade power across the interconnectors between SEM and BETTA.

Brookfield Renewable have a number of queries relating to Credit Cover Parameters as provided in SEM-17-009a, as outlined below:

ID	I-SEM Credit Cover Parameters Reference	Short Title	Commentary / Explanation
1	Page 5 Section 1.1	Overview	Can further clarity be given around the impact of a Participant defaulting? Is defaulting calculated at a Unit level or is there the possibility to net across multiple units? What impact does this have on Day-Ahead and Intra-Day trading?

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ID	I-SEM Credit Cover Parameters Reference	Short Title	Commentary / Explanation
2	Page 38 Section 7.2.1	Gap Analysis	There is value in Participants having the ability to configure Warning Limits at a level lower than the set/agreed limit. We would be in favour of maintaining this in I-SEM.
3	Page 40 Section 7.4	Recommendations	We are in favour of maintaining the Warning Limit at the current level of 75% especially if there isn't the option to configure Warning Limits per Participant.
4	Page 41 Section 8.2	Considerations	Can further clarity be given around the process/steps to be followed for putting additional collateral in place? Does it have to be in the form of cash if there is only a 2 day turnaround in this instance or if there is a LOC does a soft copy suffice? How long does the increase take to be recognised on the SEM side?

Should you require any further information in relation to the points raised above please don't hesitate to get in touch.

Kind regards,

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