

ESB Independent Energy Response to the AIP Consultation “Fixed Cost of a New Entrant Peaking Plant for the Capacity Payment Mechanism”

ESB Independent Energy (ESBle) welcomes the opportunity to comment on the Fixed Costs of a New Entrant Peaking Plant. The following high level comments are offered:

- It is the view of ESBle that the costs of booking gas capacity should be included in the fixed costs of the plant, albeit that this capacity may be interruptible.
- ESBle consider that the power output degradation of 4% would be more appropriate than the 3% level quoted, based on ESBI industry experience.
- Again, ESBI experience has suggested that a forced outage rate of closer to 93% would be more appropriate than the 95% level quoted.