



Electric Ireland Response:

**Consultation on Amendments to the Duration of the
Directed Contracts Primary Subscription Window**

SEM-23-015

1st March 2023

General Comments

Electric Ireland (EI) welcomes the opportunity to respond to the SEM Committee consultation on Amendments to the Duration of the Directed Contracts Primary Subscription Window.

EI supports the six-day Primary Subscription Window, but we do not agree that market participants should be obliged to participate during each day (i.e. eligible to purchase only 1/6th of their allocated volumes).

Responses to Consultation Questions

- 1. Do you agree that the proposed amendments to the duration of the DC Primary Subscription Window should become an enduring arrangement? If you agree or disagree, please set out your rationale.**

Yes, Electric Ireland agrees that the proposed amendments to the duration of the DC Primary Subscription Window should become an enduring arrangement.

- 2. Do you agree that market participants should be obliged to participate during each day of the Primary Subscription Window in a given DC Round, i.e., suppliers would be eligible to purchase only 1/6th of their allocated volumes during each day of the six-day Primary Subscription Window? If you agree or disagree, please set out your rationale.**

We do not agree that market participants should be obliged to participate during each day or restricted in terms of daily volumes on any given day as this would limit flexibility for suppliers.