



ESB International

ESBI COMMENTS ON

SEM COMMITTEE

**MARKET POWER MITIGATION IN THE SEM DIRECTED
CONTRACT IMPLEMENTATION REPORT (DRAFT)**

Introduction

This response is submitted by ESB International on behalf of Coolkeeragh ESB Ltd, Hibernian Wind Power Ltd, ESB Independent Energy RoI Supply and ESB Independent Energy NI Supply. ESBI appreciates the opportunity to comment on these important regulatory parameters and we have no objection to all or part of it being published by the Regulatory Authorities (RAs).

ESBI broadly supports the approach set out in the draft report.

The draft report proposes to align the Directed Contract products with electricity forward agreement (EFA) product blocks available in the BETTA market, changing:

- the definition of the peak period from the trading periods arising during the hours beginning at 16:30 and ending at 20:00 to one beginning at 17.00 and ending at 21.00 on all days during the fourth and first quarters of the year;
- the definition of the mid-merit period from one which begins at 07.30 to one that begins at 07.00.

It also proposes to allow elections for products on a quarterly basis instead of on a monthly basis.

ESBI supports this change and recommend that the contracts are made available on a shorter timeframe. ESBI would also recommend to the RAs that mid-merit contracts are expanded to include the weekends as well as weekdays.