# ESB International

18th July 2008

Kevin O'Neill,

NIARU,

Queens House,
14 Queens Street,

Belfast BT1 6ER

**Ref:     SEMO Revenue and Tariffs & TSO Dispatch Balancing Costs for October 2008 – September 2009.**

Dear Kevin,

I attach ESB International (ESBI) response to the above consultation.

Kind regards

David Vaughan
**Back Office Manager,**
**Independent Generation,**
**ESB International**

**ESBI** RESPONSE

# SEMO Revenue and Tariffs & TSO Dispatch Balancing Costs for October 2008 – September 2009.

## A CONSULTATION PAPER

This response is submitted by ESB International on behalf of Coolkeeragh ESB Ltd.  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).

While SEMO provides the secretariat function for the industry-wide Modifications Committee, a similar cross-industry function is required to establish an Industry Baseline for the Central Market Systems and manage subsequent change to these baseline components.  At present there is not an established industry-wide process for managing non-T&SC driven changes to the central market systems. Indeed Section 2.2.1 of AP11 notes that "The Market Operator shall implement a change management process" to deal with operational improvements to the central market systems which do not require Modifications.  ESBI understands that SEMO is advanced in its thoughts on how this critical function will operate and that SEMO proposals will be communicated to all interested parties in the near future.  However, it is timely now to ensure that SEMO resource levels are set at the appropriate level to establish this SEMO Design Authority Function (SDA) and to ensure that it can provide the level of service required by the industry. The IGG established to support change in the Retail Market in Republic of Ireland may be a good reference point in terms of resource levels required for the SDA in SEM.