



IWEA response to the SEM Consultation on the Extension to the Criteria for Approval of Intermediary Applications under the Trading and Settlement Code

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IWEA welcomes the opportunity to respond to the Consultation on the Extension to the Criteria for Approval of Intermediary Applications under the Trading and Settlement Code. We welcome the proposal to extend the criteria to allow Price Maker Generator Units to appoint an intermediary to act on behalf of these units. IWEA would like to clarify that this extension will apply to **Variable** Price Maker Generator Units. This change would be required to enable large wind farms to become price makers if they choose to do so.

One of the conditions within the consultation is that the generator's MEC is less than 50MW. IWEA does not think that there should be a limit on the MEC. There are a number of wind farms which would be larger than this and it is important that this option is available to them.

There is a condition in the consultation paper which outlines that an Intermediary can only be appointed to act on behalf of a Price Maker Generator Unit if there is no other way that the support-scheme payment can be received in the SEM. IWEA believes that this condition over-complicates the process and should be removed.

In the consultation it states that *"If there is a change in ability to access the payments for some reason (due to any SEM Committee decision on dispatch and scheduling and/or relevant legislation in either jurisdiction, for example), this policy may be reviewed."* IWEA would like to reiterate the need for an overall framework for policy changes and that the impact of individual changes must be recognised in the context of the overall policy framework and roadmap.