

PG Comments on MAE Consultation Paper

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Power Generation

Market Dispatch Issues

- Linear programming insufficient
- Clear rules for choice of plant
- Take account of plant characteristics
- Validity of offers
- Submission of Offer Curves
- Dispatch close to real time



Treatment of Reserve

- We disagree with the concept that the SMO will contract directly with generators and make their offers into the market
 - Co-optimisation of energy and AS bid
 - NG have no rights to offer services of generators into the market
- CER should set prices not SMO



Regulatory Risk

- CER's intervention into the market must be clearly defined
- Any penalties or sanctions that can be levied by CER should be clearly made known in advance of market



Questions 1,2&3

- Demand Participation
 - We prefer option 1
- Access to information
 - Some information real time; some ex post
- Node Design
 - Complication V Cost



Questions 4 & 5

- Treatment of Pumped Storage
 - Agree that there should be additional rules for PS
 - Agree with proposed additional rules
 - Suggest that long term contract with NG may be best way to proceed
- Charging for Reserve
 - Should be paid by customer



END



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