



Energy for
generations

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Sent by email only-

RE: Balancing Market Principles Statement Consultation Response

Dear Sir/Madam,

ESB welcomes the opportunity to comment on the Balancing Market Principles Statement (BMPS) revisions (published 10th of January) and believes that the comments provided in this response should help further achieve the BMPS objectives.

ESB comments on Balancing Market Principles Statement Revisions

- 4.3.2. SCHEDULING RUN TYPES: RTD, RTC AND LTS

We note the change to the LTS run times from 4 hours to 2/3 hours in this section and would like clarification as to why this change was made.

- 4.5.3.2. COST MINIMISATION

ESB believes further information on the TSO determination/incentives for deviating from the schedules when dispatching is required in this section.

- Section 4.5.4 – PROVISION OF TRANSPARENCY

The application of weekly constraints is unknown, and how the SO flags are created from these weekly constraints is unknown. ESB believes that the publication of ad-hoc constraints is insufficient and appears to be only discussed through the MOUG. Therefore, ESB believes there is scope for the SEMO/TSO to provide greater transparency on the application of these constraints and creation/non creation of the relevant flags.

- Section 4.6 – DATA TO PRICING AND SETTLEMENT SYSTEMS

ESB believes that it needs to be clearly defined whether the “Methodology for System Operator and Non-Marginal Flagging” document referenced in the last line of this section, is indicative or not. It is ESB’s understanding that this document is a binding document for



creating flags under the T&SC however it is unclear. ESB would like clarification on this point.

- Section 5.3 – AUDIT

The revisions here state that an Audit will be conducted annually. It is ESB's position that an audit should be completed six monthly within the first year, given the infancy of the market. In addition, we believe that the Audit needs a terms of reference which would provide transparency and clarity for industry.

- Section 6.3 – OPERATIONAL PROCESSES

This section references “common EirGrid and SONI processes that describe step step-by-by-step actions taken in the short short-term planning and real-time operation of the power system.” The processes should be listed in this section.

EirGrid's Business Process (BP_SO_9.2) does not provide any information on the timing of publishing an amber alert. ESB believes that more information on the process timing for determining and publishing an alert would be extremely useful for market participants.

- Appendix 2.1

ESB believes that the EirGrid's Business Process “BP_SO_11.2 CBB Trading between EirGrid/SONI and NGET” document should be published and made transparent.

I look forward to your response.

Yours sincerely

Paraic Higgins

Regulation

ESB GWM