



***Response to SEM-11-089***  
***SEM Market Power & Liquidity***  
***A SEM Committee Draft Decision***

**on behalf of**

**AES Ballylumford Ltd and AES Kilroot Power Ltd**

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*Queries to*

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## **Introduction**

AES Ballylumford Limited and AES Kilroot Power Limited (collectively “AES”) welcome the opportunity to comment on the Single Electricity Market Committee’s (“SEMC’s”) ‘SEM Market Power & Liquidity – A SEM Committee Draft Decision’ Paper (“the Draft Decision Paper”).

## **Comments**

As set out in its response to SEM-10-084 ‘Consultation on SEM Market Power and Liquidity’ AES believes that the SEMC’s existing Market Power Mitigation Strategy is fit for purpose at this time. AES therefore supports the SEMC decision to maintain its existing Market Power Mitigation Strategy for the foreseeable future. AES also agrees that if the market becomes significantly less concentrated in the future it would be appropriate for the SEMC to review its Market Power Mitigation Strategy. AES would however stress that any future proposals to amend the SEMC’s current Market Power Mitigation Strategy should be fully consulted on.

AES also supports the SEMC’s decision not to allow either of ESB’s full or partial vertical integration options at this time. AES would again stress that any future review of this decision should be fully consulted on.

AES welcomes the development of the Tullet Prebon Over the Counter brokered market and the SEMC’s decision to allow an industry led approach to further liquidity development. AES will therefore continue to work through the National Electricity Association of Ireland to achieve this.