

Elaine Gallagher Commission for Energy Regulation, The Exchange , Belgard Square North, Tallaght, Dublin 24 Kenny Dane, Utility Regulator, Queens House, 14 Queen Street, Belfast.

Dear Elaine, Kenny,

Bord na Móna (BnM) welcomes the opportunity to respond to the SEM Committee's consultation paper on the 'Trading and Settlement Code Annual Operational Parameters for 2014' This consultation paper examines the values which should be employed for the determination of credit cover, MSP Software Penalty Costs, Annual Capacity Exchange Rate, parameters used in the calculation of Uninstructed Imbalances and the Flattening Power Factor.

Parameters for the determination of Required Credit Cover

BnM notes the values of these parameters, suggested by SEMO, and supports their adoption for 2014.

MSP Software Penalty Cost Parameters

BnM notes the values of these parameters, suggested by SEMO, and supports their adoption for 2014.

Annual Capacity Exchange Rate

BnM understands that the Annual Capacity Exchange Rate will be proposed to the RA's by SEMO in early December.

Parameters used in the calculation of Uninstructed Imbalances

BnM notes the values of these parameters, suggested by the TSO's, and supports their adoption for 2014.

Flattening Power Factor (FPF)

BnM welcomes the decision to retain the current factor of 0.35 as the FPF for 2014.

Kind regards,

Sinead Keogh Market Analyst

Bord na Móna PowerGen

Swead Keogh