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Utility Regulator  
Queens House, 14 Queen Street  
Belfast, BT1 6ED

Gonzalo Saenz  
Commission for Energy Regulation  
The Exchange, Belgard Square North  
Dublin 24

28<sup>th</sup> July 2016

Dear Joe and Gonzalo,  
Dublin Waste to Energy Ltd. welcomes the opportunity to respond to the SEMC consultation paper SEM-16-030, "Measures to promote liquidity in the I-SEM forward market".

We are restricting our comments to the Forward Contracting Sell Obligation (FCSO) de minimis threshold of 267GWh per annum, and how subsidised generators are measured against that threshold.

We note that Edenderry Power Limited's MSQ volume is calculated without reference to the fact that a portion of its MSQ is contracted under REFIT. Entering into a contract against REFIT subsidised power would mean that the purpose of the REFIT subsidy would be undermined, as REFIT will not compensate the generator for cash-out against the FCSO.

Our plant is considered part renewable under REFIT 3. For the above reason we want it confirmed that any obligation to contract under the FCSO is determined using forecasts of non-subsidised generation volumes, i.e. the "brown" portion of the electricity from our plant.

To oblige part-renewable subsidised generation to participate in the FCSO would be to undermine the certainty of revenue afforded under REFIT scheme.

By means of example:

- 30MW plant, 92% Market Load Factor 50% renewable.
- Annual forecast of power:  $30\text{MW} \times 8760 \times 92\% \times 50\% = 120.8\text{GWh}$
- As  $120.8\text{GWh} < 267\text{GWh}$ , no FCSO will apply.

For the avoidance of doubt, however, we believe that non-obligated smaller parties should be allowed to participate in a FCSO auction, should they choose to do so.

Thank you for consideration of this short response.

Yours Sincerely,

  
John Daly  
General Manager