

APPENDIX A RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	AES
Type of Stakeholder	Generator
Contact name (for any queries)	Denis McBride
Contact Email Address	denis.mcbride@aes.com
Contact Telephone Number	00442893256200 ext 3518

I-SEM TSC COMMENTS

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
1	Section B 10.4.1.	I/C Units	Registration of I/C Units – AES were under the impression that there would no longer be any I/C Units	Confusion caused If being retained for ECC then this should be stated for ECC use only and a different category of unit used.	This section is removed – How is ECC accommodated.

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
2	Section B 17.8.1	Mods Committee	Removal of a member (b) is or becomes of unsound mind	Who on the mods committee is capable of determining this.	Suggest remove the unsound mind wording as not needed and leave at becomes incapable of performing the functions of a member
3	Section B 19.1.3	Dispute Resolution	5 working days notice for pricing and settlement query disputes of being published	Should this be longer initially as is dependent on notification and new market timelines unclear?	
4	Section D 4.2.8	Forecast Availability Profile – Dual Rated Unit	Dual Rated limit definition – Maximum capability in MW limited by its lower capacity rating	The result of this definition seems to imply that a dual rated unit must declare its forecast availability capped at its lower availability. This is not correct. Please clarify the intention of this clause. Having the availability of the unit limited to the lower capacity rating shall limit the ability of the TSO to access the higher MW. Notwithstanding that, there would be a need to submit different Inc and Dec for the higher MW – this may not be mathematically possible if the higher availability is not declared Remove the “limited by its lower capacity rating” phrase.	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
5	Section D 6.3.2	Dual Rating Definition	Generator which has 2 distinct capacity ratings corresponding to 2 distinct fuel sources	Definition appears to cover 2 distinct fuel sources but does not cover a unit which uses both fuel simultaneously	
6	Section D.6.3.2	There is a reference for Dual Rated Generator Unit to provide ' <u>data</u> ' for Primary and Secondary fuels.	<p>There should be a defined term for this 'data'.</p> <p>The availability profile is already capped at the lower capability as per D.4.2.8. There is a conflict between these 2 clauses.</p> <p>The 'Rating Flag' submission – NEED to stipulate by WHO this is to be submitted. Generator or TSO?</p>	Dual Rated units do NOT have primary and secondary fuels.	
7	Section E 4.4.1 & 4.4.2	Determination of the Reserve Scarcity Price	Operating Reserve Requirement & Short Term Operating Reserve are significant parameters in anticipating scarcity and should be made available to participants in real time.	Include some wording to place requirements on the TSO and MO to make both parameters available.	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
8	Section F 6.4.1	Trade in opposite direction to the TSO	Wording “where the RAs have given notice to the MO to include QAOTOTSO” seems to imply that this option is not included or can be included when required.	Please clarify when this notice would be used and for what reasons.	
9	General	Notice of parameter changes	There are a significant number of references across the code to publishing parameters either within 5 WD of their determination by the RAs or 'X' months before the relevant period "whichever is the later". 5 WD notice of parameters is unacceptable	Please re-phrase affected sections by replacing "whichever is the later" with "whichever is the earlier" so the X months notice as applicable, is the minimum notice that will be provided	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
10	General	Within year change of parameters	There are a number of references to allowing within year changes to parameters e.g. imperfections charges. This is unacceptable particularly from a pricing/ tariff perspective and current k-factor approach should remain	Remove potential for within year changes to parameters affecting customers where applicable	
11	Section F 2.2.2	Credit Assessment	There should be an additional paragraph added after F.2.2.2 stating that participants will have the ability to carry out their own credit assessment at any time and that the result of the Market Operators credit assessment for each participant will be made available to that particular participant.		

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
12	Section G 12.1.49	Credit Cover Arrangements	Since NEMO is settled daily there should be an option to prepay a settlement day that has not yet been issued. The additional payment option will reduce a participant's exposure to credit cover increase notices.	Introduce option to prepay a settlement day that has not yet been issued	

NB please add extra rows as needed.