



**Viridian response to consultation on
SEMOpX Price Control
Draft Determination Consultation paper
*SEM-17-053***

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1. Introduction

This response submitted by Viridian is an amalgamation of the individual business responses from Energia, PPB and Power NI. Viridian welcomes the opportunity to respond to the SEMO consultation paper on the Draft SEMOpx Price Control issued on 28th July 2017. Viridian has actively and constructively engaged in all aspects of the I-SEM project and related consultation processes as it is essential to ensure the new and complex I-SEM market is fit for purpose for all market participants in the years ahead.

There are a number of important details missing from the draft SEMOpx Price Control document including details on a number of key costs. Not having this detail makes it impossible to submit a fully informed view on the proposals outlined in the paper. However on the basis of what has been outlined in the paper, while the fixed entry and annual subscription fees are reasonably low, the variable trading fee is the more expensive than any in Europe in the range provided in the initial consultation (SEM-17-018). Given the fact the service is essentially outsourced to EPEX, and given the market size of Ireland, there does not appear to be a logic for such a high cost, which will ultimately detrimentally affect customer costs. Such costs should be re-evaluated, and while full details have not been provided as to how the various tariffs have been calculated, the proposed costs of c€4.2m are the driver and thus must be too high. The resource model proposed may have one third too many employees, and the rates outlined per employee appear high. Further the shared costs of systems, facilities and coproprate costs should be challenged.

Section 2 outlines our Viridians key concerns and comments in relation to the consultation paper. Section 3 provides more detailed comments on some specific aspects consulted upon in the paper. Finally we provide some summary comments in our concluding remarks in Section 4.

2. Key Comments

2.1 The consultation paper is missing some key information

The intent of this consultation is understood to be to inform market participants of the likely costs of the SEMOpx service, and therefore allow market participants the opportunity to comment on the cost proposals being made. To have true value as much up-to-date information as possible should be provided thereby enabling parties to make informed comments. However

there are areas of missing information which prevent a fully informed view being formed. Examples of this include;

- Third party costs associated with the Power Exchange and Central Counterparty (as these have not yet been negotiated)
- Any costs attributed to a participant (as these have not been factored into the cost estimates)
- The costs outlined in the paper appear to be only for access for one user per company. There are no details provided for the cost of additional users. Further the paper is silent on the “technical costs” of EPEX.
- The interaction between the SEMO, SEMOpx, and TSO price controls is not clear given the assumption that SEMO and SEMOpx are not restricted in sharing premises, personnel or systems, but in doing so synergies and savings should accrue potentially affecting multiple price controls.
- The uncertainty in relation to whether SEMOpx will continue to operate as a NEMO after 3rd October 2019 leads to uncertainty in relation to the establishment costs remaining under the TSOs RAB, plus any accrued “unforeseen” costs, or costs arising due to volume forecast inaccuracies.

Acknowledging that there is still some missing information, such as that outlined above, Viridian reserves the right to amend or alter any comments or opinions it has made in its submission to this consultation.

2.2 The variable trading fee is not competitive

The variable trading fee of €0.041/MWh is 2.5% higher than the maximum for day ahead markets in Europe as outlined in the paper SEM-17-018, but 59% lower than the maximum intraday fee outlined in the same paper. However when compared to the average trading fees in Europe, the SEMOpx fee appears to be 26% above the average day ahead fee, and 33% lower than the average intraday fee. It is noted that no weighted average trading fee values were provided in SEM-17-018 which would make this comparison more meaningful.

There are two scenarios detailed in the paper for how much of the total traded volume will be traded in the Day Ahead market versus the intraday market. The first assumption is that 95% will be traded in the day ahead market. In this first scenario the total revenues from SEMOpx fees would be of the order of 16.4% above the average in Europe. The second assumption is that 80% will be traded in the day ahead market. In this second scenario the total revenues from SEMOpx fees would be of the order of 12.6% below the average in Europe.

Given the complexity in I-SEM, and the risk associated with same, as well as the restriction on order types in the IDM, it appears what will occur in I-SEM is more likely to be along the lines of the first scenario (95% traded in the DAM) and thus the SEMOpx fee appears more likely to be at the high end of European trading fees. This is not in the interests of the market, and in

particular the customers who will ultimately have to pay these costs. It is thus suggested that the variable fee be relooked at with a view of landing on a more reasonable trading fee which will assist household and business customers, and Ireland's competitiveness.

2.3 The SEMOpx level of resources required appears high

SEMOpx have outlined that despite shared resources between SEMOpx and the TSOs, they believe they still require 12.75 FTEs to provide SEMOpx services. This number appears high given that the service appears to essentially involve managing a contracted service from EPEX. The RAs have stated they are of the view that SEMOpx require "robust resourcing" to ensure that the requirements of I-SEM can be represented at a European Level. While this view has merit, and is understandable, there is potentially only a maximum of 2 (15%) of the 12.75 FTEs (stated as being required by SEMOpx) are likely to be involved in this European representation role given their title of "Market and Product Development". Hence it appears that the vast bulk (85%) of resources are not involved in representing SEMOpx in Europe, and thus very strict criteria should be used to justify such other roles, and the number of employees involved in same.

It is contended that there is a potential reduction in FTEs possible from that outlined in the SEMOpx submission on the basis that:

- (i) it appears very unlikely that a legal resource will be fully utilised throughout the year and that an estimate of 0.5 FTE is a more reasonable estimate
- (ii) it appears unlikely a full time registration person will be fully utilised, or that two full time customer service personnel will be fully utilised, and thus 2 people to cover both registrations and customer service appears more likely to reflect the actual requirement
- (iii) it appears very unlikely that three IT people will be fully utilised on an ongoing basis given this is managing a service from EPEX and leveraging their systems. Hence a least one of these appears surplus to what will actually be required.
- (iv) the Vendor Service Management and Vendor Commercial Management could be merged into one role.
- (v) the details of why there is a requirement for two full time people involved in Market and Product Development has not been shared with industry and thus this is queried. However if there is a strong case for this, and these are the people who will be representing SEMOpx in Europe, this may be reasonable.

While the paper suggests that the details provided show both direct and indirect costs, no details of this has been provided. Without such detail it is impossible to determine if this is then reasonable or not.

There appears to have been very limited analysis of the proposed SEMOpx resource model, with the only comparison that has been made appearing to be to the Hungarian Power Exchange. With such limited analysis it is very difficult for market participants to form a strong view on the basis of facts in relation to the appropriateness or otherwise of the resource model proposed by SEMOpx. In the absence of this detail, the comments Viridian have made are based on the information presented.

2.4 The level of remuneration for SEMOpx resources appears high

The proposed resource structure indicates an average remuneration of €92k per employee. This is above what one would have expected for a service to essentially manage an outsourced contract. While the paper contends that these remuneration packages have been compared to employee costs in the TSOs it is contended that the appropriate benchmark is not this but instead other NEMOs. Without this detail market participants are missing a true benchmark, and thus it is not possible to submit valuable commentary except to state that the costs as proposed are certainly on the high end of what should be the case for such a service.

2.5 Lack of Benchmarking

There is very few useful comparisons provided in the paper to provide a good picture of how the SEMOpx proposal compares to other similar entities. For example;

- (i) there is only one comparison given on how the proposed SEMOpx resource model compares to other NEMOs or power exchanges with only a comparison to the Hungarian Power Exchange.
- (ii) In terms of salary levels the only comparison that is made to is the salaries in the TSOs in Ireland, which is not a real comparison to other NEMOs/power exchanges.
- (iii) There is no benchmarking provided on the proposed facilities costs (which are shared), the appropriateness of the proposed share of Corporate costs, or how the proposed total costs (€4.866m reduced to €4.179m) compares to other NEMOs/power exchanges.
- (iv) There is no comment passed on how the proposed 10% SEMOpx management fee compares to other NEMOs/power exchanges which will be important after the 5 year recovery of SEMOpx establishment costs via the TSOs RAB.

Given the lack comparisons it is extremely difficult to make an educated comment on what is the real driver for the higher than expected trading fees a proposed by SEMOpx, which could be useful in determining what areas should be looked at the find ways to reduce such costs.

2.6 Impact of the SEMO and SEMOpx assumption on sharing

SEMO and SEMOpx are operating on the basis that there are “*no restrictions concerning the sharing of premises, personnel or systems from each other or an affiliate or related undertaking*”. Viridian request that the RAs confirm that the absence of any such restrictions on sharing these resources does not impart an undue competitive advantage on SEMOpx compared to other NEMOs either in terms of cost, access to information, or otherwise. Viridian would also like to see full details as to how the market is obtaining the maximum value from this allowed sharing of personnel, premises and systems, and that potential synergies are fully exploited to the benefit of the market, whether that be through reduced costs in SEMOpx or reduced costs in SEMO as sharing resources should create savings in one or both places.

2.7 Performance standards & KPIs for SEMOpx not clear

While the paper outlines possible Performance Standards and KPIs for SEMOpx, nothing has been outlined to indicate what the TSOs/RAs are actually minded to implement. As such there is a fear that what has been outlined may not be what is implemented. Further, little detail related to the actual deliverables from SEMOpx under the potential KPIs or performance standards has been provided and thus it is difficult to comment on whether the potential performance standards and KPIs are appropriate. Without knowing the full detail, including the timeframes for delivery, of what SEMOpx will be delivering to market participants through the various reports (e.g. data publications and performance of market monitor, market results) it is not possible to advise whether the performance standards are fit for purpose, or whether they will be effective or worthwhile.

As proposed in our submission to the consultation on Revenue Principles (SEM-17-018) Viridian would strongly contend that as a NEMO, SEMOpx should have certain Licence requirements related to performance, given how critical the information they will provide is to the market, and that providing this information should not form any part of an incentive regime for SEMOpx. By doing this to SEMOpx it means the same can be implemented for additional NEMOs, and thus the market is always clear what performance it will receive regardless of who the NEMO is that they are using.

Viridian seek assurances that SEMOpx (and indeed any other NEMO) will not act as a barrier to the prompt flow of information in the market, and that any information flowing to them from EPEX (and others) will be immediately forwarded to ISEM market participants. Without such prompt movement of information ISEM market participants could find themselves at a disadvantage in the market to players in other markets, to the detriment ultimately of end customers in ISEM.

2.8 Role and obligation clarity for EPEX, SEMOpx and SEMO

It is assumed that the RAs have approved the contractual arrangements between SEMOpx and EPEX. However Viridian are very unclear what the relationship is between SEMO, SEMOpx and EPEX, and further clarity in this regard is requested. For example are EPEX a signatory to the SEMOpx Exchange Membership Agreement? What is the contractual relationship between members of the SEMOpx exchange and EPEX? What liabilities and/or warranties have EPEX provided to the ISEM market, and what performance standards and/or KPIs are they contractually bound by? What form of service is being provided to ISEM by EPEX?

The RAs and TSOs are asked to provide as much clarity in this regard as possible.

3. Comments on specific aspects

This section provides comments on specific aspects of the draft SEMOpx Price Control consultation paper. These specific comments have been included in Appendix A to this consultation response.

4. Conclusions

With a number of key pieces of information missing from the consultation, it appears to be premature to be consulting on the SEMOpx Price Control at this time. It is a concern when some costs which could be material remain unknown nine months before go live of the ISEM market, in particular as such costs are being flagged as pass through costs to customers. As the proposed variable tariff is one of the highest in Europe (indeed the highest in the day-ahead market), given the missing cost information, Viridian are concerned the costs will rise further, making the competitiveness of trading in ISEM even worse in the European context. The TSOs and RAs are asked to revisit the proposal as outlined with a view to making the fees more economically competitive than other European member states. Such a move would in some way recognise the fact that ISEM already has heightened costs due to its geographical position at the end of the European gas pipeline (with corresponding increased gas costs), its island status (and the generation and networks impact of this), and given the dispersed demographic. Viridian would encourage further engagement between the RAs and TSOs, and industry in order to achieve a desirable outcome for all stakeholders in ISEM.

APPENDIX A
Specific Comments on specific parts of the paper

No.	Page	Section/ Para	Comment	Questions/Comments
1	3	1.1	Paper references a 75%:25% split but as CAPEX is to be consolidated into the TSOs RAB, that might be relevant but the same principle does not necessarily carry to OPEX since that is not recovered via the individual TSOs	It is not clear what relevance this has as it seems to be a single price control. Also it isn't clear whether the TSOs have sought to minimise costs by locating the function in the lowest cost area. E.g. if NI premises and staff costs are lower should the whole service not be delivered from NI?
2	4	1.2	The paper purports that SEMOpx is somewhat unusual in that it operates in an environment where competition amongst NEMOs is in place, but also where SEMOpx is designated under licence and will operate for this price control under an allowed revenue regime	While NordPool have advised that they are planning to offer NEMO services in I-SEM there is no guarantee that this will happen by go-live. Given this, and the fact that the price control is only for 16 months, assuming SEMOpx operates in a competitive environment is not a given and may not reflect the reality in the market.
3	4	1.2	The RAs have stated they are of the view that SEMOpx required "robust resourcing" to ensure that the requirements of I-SEM can be represented at a European Level	While the RA support for SEMOpx being actively involved in Europe has merit, and is understandable, there are only 2 (15%) of the 12.75 FTEs (stated as being required by SEMOpx) are involved in "Market and Product Development". Given the vast bulk (85%) of resources are not involved in representing SEMOpx in Europe, very strict criteria should be used to justify such other roles, and the number involved in same.

4	5	1.3	The cost of establishing SEMOpx has been detailed to be €3.8m	No detail has been provided to market participants on the makeup of this amount of money, and no consultation has occurred on this item. This is inappropriate given that market participants ultimately have to pay these costs. Further details are requested in the form of a consultation on this issue.
5	7	2	Clause 2 states that "costs associated with running registration and auctions prior to Go-Live on 23 May 2018 have been included in the submission".	Should these costs not be treated as market establishment costs? For example the auction process will be the first and hence there will be more work that will benefit future processes. Hence it would seem logical to capitalise the costs.
6	8	2.1	The paper suggests that 20% of the €3.8m SEMOpx establishment costs should be recouped through SEMOpx Price Control as opposed to through the TSOs RAB.	What is the justification for the 20%? It is not clear what accounting standards have to do with this decision? There appears to be no clarity or justification for these apparently arbitrary decisions. Also see previous comment 5 relating to capitalisation of all establishment costs
7	8	2.2	Reference made to indirect labour costs, but no split between Direct and Indirect costs has been provided.	If these are costs reallocated from SEMO, Eirgrid or SONI then presumably there should be an equal and opposite reduction in their price control allowances? Details of the full split between Direct and Indirect costs must be provided in order to fully inform the market.

8	9	2.2	The costs provided reportedly factor in the benefits Eirgrid and SONI have calculated from taking advantage of economies of scale and scope from the operation of SEMOpx through single combined functions. This is valued at €80k on page 11.	No supporting detail has been provided for this €80k figure and this along with what appears to be very limited benchmarking to other NEMOs and potentially an inflated resource submission, makes it impossible for respondents to this paper to express informed views on what has been outlined, and specifically whether this represents good value or not.
9	9	Table 2 in Clause 2.2	The average labour cost per FTE seem very high at €92k p.a.	This seems to be a very high figure given recent trends in the employment market, including for trading staff. What justification for this has been provided? What benchmarking of these costs relative to similar NEMO or power exchange entities has been performed? Also as SEMOpx can be located anywhere has there been a full analysis to show the proposed SEMOpx resources are to be engaged in the lowest cost location?
10	9 / 10	Figure 1 and following summary of roles	The detailed staffing requirement for 12.75 FTE's seems very high for essentially managing a contracted out service. No clarity has been provided as to what roles are direct and what are indirect.	It is questionable if there is a real requirement for 2 FTEs for vendor management to manage an outsourced contract? Why is there such a high IT Support team (3 FTE's) when the market is assuming all the services are hosted by ECC/EPEX? It is very hard to see how a full time legal person and a full time registration person would be fully utilised.

11	9 / 10	Figure 1 and following summary of roles	Support Services - General Query	Viridian has assumed that logically the whole Support Services activity is a shared function with SEMO such that there is a single point of contact for all I-SEM related trading problems and efficient utilisation of resources. As such to the extent that the cost is a reallocation of existing costs within SEMO/TSO's then as long as the allocation to SEMOpx is offset by a reduction in the other price controls then it has no net effect on customers - although allocation would need to be robust to ensure no tariff distortion Vs competitor NEMOs. Clarity and confirmation in this regard is sought.
12	11	RA Analysis	There is very limited benchmarking set out against SEMOpx costs etc. The consultation paper references that consideration has been given to benchmarking (and gave one example only of the Hungarian Power Market, any one related to resourcing) but no detail is set out in the paper to show these cost comparisons. There does not appear to be any demonstration of any rigorous challenge inc. relating to location of services. Also there is no reference to costs allocated from SEMO/TSOs being matched by an equivalent reduction there.	Greater benchmarking should be set out for Market participants to enable easy comparison, and based on the full cost of the service not just resourcing. Offsetting reductions in other areas should be identified where costs have been reallocated. Clarity should be provided as to how the SEMOpx price control interplays with the SEMO price control? For example is the SEMO price control reducing given it is now only dealing with the BM volumes?
13	11	RA Analysis	The comments at the bottom of the page specifically relating to Market/Product development are valid and reasonable; however the permanent need for this level of resource is questionable.	Viridian agrees with the RAs view expressed that the level of resource outlined may not be required in the longer term, and thus question if it is genuinely needed in the shorter term either.

14	13	Table 4	No reference to shared costs that are allocated to SEMOpx being offset by any reduction in SEMO/Eirgrid/SONI price control allowances to avoid double recovery	Further details on this are requested.
15	13	Table 4	The costs outlined for Facilities seem high for 12.75 FTEs. Again if there are reallocations of costs (e.g. space at the Oval) then we presume that is already being provided for in SEMO or Eirgrid price controls and hence they must be reduced there?	The market needs to ensure that there is no potential for double recovery and that any new costs are efficiently incurred in the cheapest location (including in NI or ROI). Confirmation in this regard is requested.
16	13	Table 4	The allocation of corporate Costs seems high	The market needs to ensure that there is no potential for double recovery and that any new costs are efficiently incurred in the cheapest location (including in NI or ROI). Confirmation in this regard is requested.
17	14	RA Analysis	Statements are made in the paper that the RAs have compared the proposed SEMOpx costs against other price controlled entities but little/nothing has been set out to enable public review and comment.	More details of what benchmarking analysis has been done should be provided, including what benchmarking analysis has been performed comparing to other NEMOs or power exchanges. This should be provided to enable objective comparisons to be made.
18	14	RA Analysis	The blending of the Enduring figures for SEMO/TSOs in Table 5 does not enable a valid check to ensure any incremental costs are incurred in the lowest cost location.	While Viridian agrees that the figure of €36k seems too high, it would be useful to see a comparison to the rates for each of SEMO, Eirgrid and SONI individually and also other NEMO entities in UK and Europe.
19	14	Table 6	Viridian agrees that the costs of SEMOpx should be lower, and agree with the 27.9% reductions as proposed for the reasons as outlined.	However not enough information has been provided to enable market participants to confirm if the RAs have reduced the costs enough, given the costs still appear high.

20	15	2.4	Why are Eirgrid and SONI charges on the basis they are 2 NEMOs given they will operate as one NEMO in ISEM? Should Eirgrid and SONI, and the RAs, not have challenged this proposal, and continue to do so?	Allocating 1/19th of the costs of the NEMO Committee to each of Eirgrid and SONI is not an appropriate cost splitting methodology. In addition to the fact that Ireland in total is so small relative to other markets, to then charge Ireland twice appears inappropriately excessive given SEMOpx is one operational NEMO in ISEM.
21	15	2.4	PCR costs are not yet known and so have been estimated by SEMOpx	If not exactly known then PCR costs should be treated as pass-through costs which will avoid the potential of under- or over-estimating and having to factor in the risks associated with this estimating
22	16	2.6	The proposal for a 10% management fee proposed by SEMOpx appears high given the market in Ireland and given the limited risk related to the SEMOpx activity.	<p>The decision of the RAs not to allow the 10% management charge is welcomed given there is full underpinning of OPEX via tariffs and of CAPEX via reallocation to TSO RABs. Further this will avoid the potential of a double reward.</p> <p>However going forward after the 5 years during which the SEMOpx establishment costs are recovered, a full robust analysis will have to be performed to determine the correct level of return for SEMOpx in the context of the market at that time. In this context the RAs are asked to advise their views on the proposed 10% figure?</p>
23	19	2.7	While the reduction in costs from €4.866m to €4.179m there remain some questions about the benchmarking of this cost, and the interaction between SEMOpx and SEMO costs	Full clarity is requested to show where costs have been re-allocated from the SEMO and/or the TSOs that their respective price controls have or will be amended where relevant to deduct any re-allocations to ensure there is no potential for double recovery of OPEX via SEMOpx.

24	20	3	The paper states that there will be no restrictions between SEMO and SEMOpX in relation to sharing premises, personnel, or systems etc	Following on from point 23, this is another reason to take extra steps to ensure that there is no potential for double recovery of OPEX.
25	20	3	Note that 3rd party costs are not yet negotiated. That is very concerning as it leaves Participants exposed to a cost over which there is little/no leverage to negotiate. This is a high risk.	Clarity is requested to provide comfort that these costs will be negotiated efficiently, and if so how? Also clarity is requested to inform what happens if these costs aren't known when the final decision is due to be made in October 2017?
26	20	3	The paper states that " <u>Any costs directly attributed to a participant</u> " have not been factored into the cost estimates but will be billed on a pass-through basis	What does the reference to " <u>Any costs directly attributed to a participant</u> " refer to, and what is the potential quantum of such costs?
27	21	3	The paragraph states that the SEMO and SEMOpX price controls are being set to ensure no cross-subsidisation. This "independence" seems to conflict with earlier assumptions on sharing?	Clarification is sought on this. It is suggested that the principle should be that costs overall must be minimised and the debate should only be over the appropriate allocation of common costs but irrespective, the costs must only be recovered once to ensure customer costs are minimised. Confirmation is requested that this is the case.
28	21-22	K-Factor	The paper outlines how the correction factor will be applied given various scenarios at the end of the designated term.	The principles in relation to the use of the correction factor seem reasonable and it is assumed that the final decision can be taken at a later stage when the environment is better known

29	24-25	Table 12 and 13	The KPIs for SEMO are outlined	<p>The concern Viridian would have with the SEMO KPIs is that they all relate to delivery within a prescribed time, with no reference to the quality of what is delivered. While time is an important factor, and will become a more important factor in ISEM for SEMOpx reports, given the complexity of ISEM compared to SEM, the quality and completeness of the reports will be equally critical.</p> <p>It is good that accuracy of reported data is flagged in the proposed performance standards for SEMOpx on page 25. However further clarity in terms of quality of reporting is requested.</p>
30	25	Table 14	Table 14 shows the KPIs for SEMO in the 2016-19 price control	The table shows that the sum of the weightings adds to 1.09 - there must be an error here?
31	25-26	KPIs	There are KPIs listed on the bottom of page 25 and KPIs are detailed in Table 15 on page 26.	<p>Viridian query are the data publications, reports and market results not all standard EPEX reports?</p> <p>It is not clear what role SEMOpx has for such reports?</p> <p>Is it proposed that SEMOpx act as an intermediary for reports from EPEX, and if so is there the potential these reports are delayed in getting to participants in ISEM which may put such participants at a disadvantage to participants in other markets?</p>
32	26	KPIs	Paragraph 4 and 5 refer to SEMOpx having an obligation to produce outcomes from each Auction " <u>no earlier than</u> " the time specified in relevant publications	Given the time criticality of this information to market participants, it would seem more logical that this obligation referred to the delivery of such information on a " <u>no later than</u> " basis. Clarity is sought here.

33	29	Tariffs	The Once off Fee and Annual subscription fees are set to €5,000 each, while the variable trading fee is set to €0.041 per MWh	The aim of the tariff regime appears to have been primarily to set relatively low fixed charges, which thus necessitates higher variable charges. The TSOs are asked to explain what was behind this decision/aim?
34	29	Tariffs	The Once off Fee and Annual subscription fees are set to €5,000 each, while the variable trading fee is set to €0.041 per MWh	The calculation of these fees appear to be based on 95% of volumes traded through SEMOpx. There is a genuine fear for participants that these costs would increase if a lower volume materialises (e.g. linked to REFIT decision on benchmark). The TSOs are asked to comment on what comfort participants should take in relation to the 95% figure?
35	29	Tariffs	The Trading fee is set to €0.041 per MWh	This figure is in excess of the most expensive day ahead trading fee in Europe as outlined in the comparison Table given on page 24 of SEM-17-018 document, and is 26% above the average fee. In comparison the fee is 33% below the average for intraday trading. However given the assumption is that 95% of all volume will be traded in the day ahead market, the SEMOpx fee would result in the SEMOpx revenue out turning 16% above the average in Europe, and thus at the high end. Justification for the charges and fees is requested, with ideally a full breakdown of how the costs and fees were calculated.
36	29	General	The Once off Fee and Annual subscription fees are set to €5,000 each, while the variable trading fee is set to €0.041 per MWh	No details have been provided if the costs outlined are for one user, or an unlimited number of users, or something in between. Clarity is sought in this regard?

37	29	General	<p>The Once off Fee and Annual subscription fees are set to €5,000 each, while the variable trading fee is set to €0.041 per MWh</p>	<p>No details have been provided as to any other costs related to using EPEX e.g. Technical costs. Clarification is sought that the charges outlined cover all costs related to the outsourcing of services to EPEX?</p> <p>Clarity is also sought in relation to what other costs are not included in this (if any) which SEMOpx intend to pass through to customers either as separate charges or through the tariff rates?</p>
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