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# Brookfield Renewable

## Response to SEM-17-053: SEMOpx Price Control Draft Determination Consultation Paper

*Submission Date: 05 September 2017*

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**RE: SEM-17-053: SEMOpX Price Control Draft Determination Consultation Paper**

Dear Sirs,

Brookfield Renewable welcome the opportunity to provide feedback on the SEMOpX Price Control Draft Determination.

Brookfield Renewable is part of Brookfield Renewable Partners L.P., one of the largest publicly-traded renewable power platforms, operating across Europe, North America and South America, with over 10,000 MW of hydroelectric and wind capacity across 15 power markets. Brookfield's Irish portfolio consists of 350 MW of operating wind capacity across 19 wind projects in 9 counties and a 200 MW wind development pipeline. Our power operating platform employs over 2,200 people globally, including full operating, development, construction oversight, and wholesale power marketing capabilities. In addition to operating a wind portfolio in the Single Electricity Market, Brookfield Renewable also actively trade power across the interconnectors between SEM and BETTA.

Brookfield Renewable's key issues relating to the SEMOpX Price Control Draft Determination Consultation Paper are outlined below.

#### **SEMOpX Costs**

- We seek clarification on whether SEMOpX costs will increase as different products come on line or do the cost projections encompass any such costs?
- Is there any expectation that I-SEM would have to cover any GB NEMO costs?

#### **Performance Standards for SEMOpX**

- Little information is provided on the final KPIs as these are currently in development but a "broad range of performance standards" is proposed. We request clarity on the performance standards and implementation timelines for these. We further request that the KPIs are prescriptive and reported on regularly.
- We believe the SEMOpX Rules and Procedures should place a strong emphasis on providing accurate, accessible and useable data from the market and we suggest that the provision of such data should be a KPI. Information provided to market participants needs to be consistent, regular, reliable and current. Relevant information also includes updates on the state of the network and planned actions of the TSO as currently information flows are insufficient to address the requirements that market participants will have

under I-SEM for the most accurate view of the market to mitigate commercial exposures to energy imbalances. To facilitate competitive trading and efficient market outcomes it is essential that all participants have access to the information required to understand the direction of the market and forecast accurately. Without up to date information, participants cannot accurately assess the risk that they are exposed to which will lead to inefficient market outcomes and increased costs to the electricity consumer.

- We note that the SEMOpX Operating Procedures are referred to a number of times however we wish to highlight that this document is currently in draft format and is incomplete. We request clarification on the outstanding items as soon as possible.

### **Tariffs**

- We note that provision of multi-user access will attract an additional fee. We request clarification on the definition of multi-user; is this a unit, party, participant, exchange member?

Should you require any further information in relation to the points raised above please don't hesitate to get in touch.

Kind regards,

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