



14<sup>th</sup> July 2020

Email: [Samuel.Harden@rwe.com](mailto:Samuel.Harden@rwe.com)

BY EMAIL ONLY  
Mr A Fitzpatrick  
Commission for Regulation of Utilities

Dear Adam

**Ref: Consultation on Intermediary Arrangements in the SEM**

Thank you very much for providing us with the opportunity to feed into the above consultation and for providing us with the short extension to the deadline. RWE Renewables Ireland is operating and developing a number of renewable projects in Ireland, across a range of renewable energy technologies. We have up to 1.3GW of projects, including onshore wind, offshore wind and battery storage.

We are very supportive of the proposals outlined, which would enable a broader range of market participants to be managed via an intermediary, should they wish to do so. It will help reduce the cost and complexity of accessing the market, which could act as a potential barrier for new entrants.

Please find attached our responses to the consultation questions.

If you have any questions regarding our response, please contact our Regulatory Affairs Manager, her email address is [kate.garth@rwe.com](mailto:kate.garth@rwe.com)

Yours sincerely

Sam Harden  
Senior Business Developer, Battery Storage

**Innogy Renewables Ireland Limited**

Unit 5, Desart House, Lower New Street Co. Kilkenny Ireland

**Registered Office:** Innogy Renewables Ireland Limited · Unit 5, Desart House, Lower New Street, Kilkenny, Ireland.

Registered in Ireland no. 589120

Directors: Cathal Hennessy, George Tottenham, Peter Lefroy, Ben Freeman (British), Martin Andre-Ferreira (British)

Response from RWE Renewables Ireland Ltd

**Question 1: The RAs propose to revise Part C of the eligibility criteria to allow for a broader range of market participant categories to apply and also to provide for renewable units which may be dispatchable and/or controllable to take part in such arrangements. The revised criterion would be; where a Wind Power Unit, a Pumped Storage Unit, a Battery Storage Unit, a Demand Side Unit or a Solar Power Unit with a Maximum Export Capacity of less than 100MW is contracted to a Supplier that is Party to the TSC.**

We agree with the proposal to revise Part C to allow for a broader range of market participants to apply, and that the necessary changes should be progressed swiftly.

**Question 2: The RAs propose to allow Suppliers to take part in Intermediary arrangements. Do you agree with this proposal and do you have a view on whether this should be available to all suppliers or only to those below a certain threshold of market share?**

No comment.

**Question 3: The RAs propose that an additional criterion is added to the Trading and Settlement Code to allow for specific registrations to be approved once they meet the SEM Committee's specific objectives in this area. A Modification to the TSC would be raised following this Consultation to provide for this change. Do you agree with this proposal?**

Yes, we agree with the proposal.

**Question 4: The RAs propose to publish a quarterly report on the SEM Committee website setting out the details of the current Intermediary arrangements in place in the SEM. Participants involved in these arrangements would be required to notify the RAs and SEMO of any changes to these. Do you agree with this proposal?**

Yes – we agree with the proposals, although we would recommend more information be provided as to the process that would be put into place (particularly with regards to the timings for any subsequent changes).

**Question 5: What is your view on the potential added value of the application of Intermediary Arrangements in the Ex-Ante Markets?**

We agree that there may be additional benefits to the market if the Intermediary Arrangements were also applied to the *ex ante* and intraday markets, and therefore we would support this proposal.

**Consultation Question 6: Are there limitations to the current arrangements which could be revised to better facilitate corporate PPAs?**

No comment.

***Question 7: Are there further changes to the FoA that the Regulatory Authorities should consider?***

No comment.