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Market Modelling Group Commission for Regulation of Utilities, The Exchange, Belgard Square North, Dublin 24, D24 PXW0

13/09/2021

Subject: PrePayPower Response to SEM 21-065

Dear Market Modelling Group,

PrePayPower would like to thank you for the opportunity to reply to this consultation. We very much welcome the recognition by the Regulatory Authorities and the SEM Committee of the issues facing non-vertically integrated and smaller supply companies. With that in mind the additional volumes are welcome and we would be supportive of continuing this arrangement into the future.

In addition, we would like to reiterate some of the points made as part of our various responses to the ISEM market power and liquidity consultations (SEM 20-045 and SEM 21-007). We believe that now more than ever there is a clear need for further DC allocations especially for non-vertically integrated and smaller supply companies. We also believe further substantial changes in the allocation methodology are required with respect to what is outlined in this paper. We look forward to your response on that topic as part of the wider forwards and liquidity piece.

Best Regards,

Colm mac Oireachtaigh Head of Forward Trading