

Chloe Kinsella,
Energy Analyst,
Independent Generation,
ESB Energy International

Paul Mc Guckin,
Moyle Interconnector Limited,
First Floor The Arena Building,
85 Ormeau Road
Belfast BT7 1SH

29th April 2011

Dear Paul,

ESBI appreciates the opportunity to comment on this consultation paper. We welcome the introduction of the Auction Management Platform and the proposed changes. This letter is written on behalf of ESB Energy International, Independent Generation.

In response to the questions posed:

Q1: **4.4 Introduction of daily capacity auctions**

We would welcome the introduction of daily auctions, but the timing of the auctions should allow the participants enough time to submit bids to SEM-O.

Q2: **4.9. Expected introduction of intra-day trading and Use-it-or-sell-it or Use-it-or-lose-it**

Our preference would be for UIOSI (Use-it-or-sell-it) for the SEM intraday capacity allocation process.

Q3: **5.1. Products**

We would be very interested in weekly products or products that align with UK products on offer.

Q4: **5.2. Volume of capacity to be offered in each timeframe**

We would like weekly products to be made available East-West.
In terms of West-East capacity, if price differentials between UK and Ireland reverse, we would like longer term export products to be made available.

Q5: **5.3. Capacity period timing**

If the Irish or UK markets become aligned with calendar day, we would then request calendar day products to be made available.

Q6: **5.4. General auction timing**

For long term auctions, we would like the auctions to be staggered and suggest the timings below. For short term daily auctions, we would like the auctions to take place at the same time as the EWIC.

- Annual auctions: 6 month stagger between Moyle and EWIC
- Seasonal auctions: 1 month stagger
- Quarterly auctions: a few days stagger
- Monthly auctions: at least 1 day stagger
- Daily auctions: No staggering

Q7: **5.5. Annual auctions**

For 2011, we are happy with the proposed annual auction dates, but from 2011 onwards, we would like the annual auctions to be staggered 6 months from the EWIC auctions.

If the regulatory environment in either jurisdiction were to change substantially, giving rise to new requirements or trading opportunities, ESBI would welcome the opportunity to consult further on capacity products and auction timings.

I can be contacted at any time to discuss the content of this letter.

Yours Sincerely,



Chloe Kinsella,
Energy Analyst, Independent Generation
ESB Energy International