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| **Company/Participant** | **Participant Comments on Mod\_11\_14 Pay-as-bid/Paid-as-bid for IC Units and Mod\_12\_14 Amendment to Make Whole Mechanism to remove settlement periods of simultaneous import and export flows** |
| Cenergise | Cenergise presentation containing comments attached in zip folder |
| ESB | ESB presentation outlining comments attached in zip folder |
| IWEA | IWEA would like information on the following in relation to all the modification proposals on Make Whole Payments for IC Users:   * Impact on cross border trades (in particular exports) * Impact on curtailment levels of wind generation * Impact on cost to the consumer * In particular a comparison between the different options would be useful. * The ideal outcome would be a Modification which addresses the concerns of all parties. Perhaps there might be a compromise which would be satisfactory and we would recommend discussion between the RAs and Electroroute on this, or perhaps a working group. * While we recognise that there does appear to be a problem that needs to be rectified, we would also be concerned about the impact on the ability to export on the IC and the knock-on impact on wind generators. |
| SSE Airtricity | * Comparable data on EA2 export bidding behaviour for the periods referenced by the proposers of **Mod\_11\_14** and **Mod\_12\_14** * Examples of non-profitable EA2 export trades (taking into account the MWP mechanism as it currently applies). |
| SOs (EirGrid and SONI) | * The main concern the TSO has in relation to the above Modifications is that they may increase the amount of constraint costs in the SEM. * The TSOs would not favour any increase to Dispatch Balancing Costs and would like clarity from the Modification proposer of what the potential impact to Dispatch Balancing costs would be if either of these two modifications were introduced. |