

## **IWEA comments on Intra Day Trading Process**

**17<sup>th</sup> August 2011**

IWEA welcomes the opportunity to comment on the Intra-Day Trading Process that has been undertaken by SEMO. IWEA acknowledges that these changes are being introduced to ensure compliance with the congestion management guidelines and that the timelines to implement these changes are tight. However, we believe that this opportunity should have been used to look at the future requirements of the energy system in Ireland and the possibilities associated with interconnector trade.

The current high level design being introduced appears to be the minimum required to satisfy the guidelines, however it does not make use of the opportunities that could be associated with an intra-day trading scenario with gate closures closer to real time. Gate closures closer to real time would enable the export of electricity at times of high wind generation as it would be possible to avail of more accurate wind forecasting.

There are a number of ongoing workstreams looking at the future of the Irish electricity system and the best way of managing a system with high levels of renewable penetration. For work ongoing on this area it is generally assumed that interconnector trade works efficiently with electricity being exported at times of excess wind. With the current high level design of the Intra Day Trading process IWEA believes that the gate closures are still too far ahead of real-time to allow for efficient trade on the interconnector.

IWEA believes that there has not been sufficient investigation into the options relating to Intra-Day Trading and interconnector use even within the current timelines. In order for Ireland to be able to realise our potential in renewable energy and to facilitate the emerging EU Market it is likely that these rules may have to be revisited at a later date at an additional cost to the consumer.