



***Consultation on Regulation (EC) 1775/2005
infringement action***

on behalf of

AES Ballylumford Power Ltd and AES Kilroot Power Ltd

21 March 2012

Queries to

Ballylumford Power Station
Islandmagee
Co. Antrim
BT40 3RS

1.0 Introduction

As a major stakeholder within both the Irish electricity and gas markets, AES welcomes the opportunity to respond to the Consultation on Regulation (EC) 1775/2005 infringement action.

2.0 Comments

Work Required to satisfy the Infringement

1. Short term products (section 3 of the consultation paper)

AES would like to fully understand the long term implications and pricing mechanism of short term firm capacity products being made available on a day ahead and within day basis to SNIP and SNP shippers. Although these products may satisfy the infringement they are unlikely to be used by any SNIP or SNP Shippers as they currently stand. To be of value to AES the business rules would need to permit the application window for securing capacity to be on a day ahead or within day basis. AES would like to understand further if this proposal has any implications to the interruptible capacity that is currently available on SNIP.

2. Virtual reverse flow (section 3 of the consultation paper)

To comment fully AES would need to understand any tariffing to be employed and see the cost benefit analysis undertaken, to ensure there are no increased costs or security of supply implications to SNIP Shippers.

3. Relevant Point on the SNP (section 4 of the consultation paper)

To comment fully AES would like to see and understand the full cost benefit analysis for both proposed locations and the full implications of such to SNIP and SNP Shippers.