

### **Anonymous Response to IOLC consultation**

While I generally support this mod, I do believe a small change could make it better.

If an asset is turning off and NG ESO need to keep it on to cover shortfalls as described in the doc, I think the proposal works without any issues.

- If the asset is off already and is outside of its MZT then I don't believe there should be any restriction. A Generator that is turned on from zero by NG has a risk of failing to start and being subject to System Imbalance Price for the duration of the MNZT, the Generator in these circumstances should be able to price in this risk.
- To know what excess profit is, you much know what the cost to the Generator is. Therefore, you could limit IOLC to assets that could have made a profit over their MZT but decided not to in order to go for more money in the BM.