

Dear Luke & Holly

We are supportive in the aim and largely supportive of the mechanism of the Inflexible Offer Licence Condition for targeting the anti-competitive behaviour of certain generators during periods of scarcity.

We question whether 'revision' of a PN is sufficient to capture the targeted behaviour. If a unit simply plans to reduce output to 0MW during a period of scarcity (and submit PNs accordingly), and no revision of the plan occurs, then this isn't covered by the condition.

We note that this consultation touches upon some wider considerations around the timeframe of balancing decisions, the role of system operator pre-Gate Closure and the interaction of the wholesale and balancing markets. We have given thoughts to these wider considerations in our REMA engagement.