

ISSUE	SPECIFIC PROVISION AFFECTED	PROPOSED AMENDMENTS ON THE PROVISIONS AFFECTED	DISCUSSION OF PROPOSAL
Does broadening the ownership base result in better electricity rates	S2(d), S28, S43(t)	To be removed	This is not an industry where “normal” competition rules work well. Forced disposal of especially smaller utility shares result in bigger players taking advantage of the situation
Practicality of including an Aggregator	S4(a)	To be removed	Adds another layer of cost, with no obvious efficiency improvements, especially when there is shortage of Generation capacity
VAT on Electricity (Generation)	S6	No revision	Why was this ignored and VAT on electricity introduced?
ERC to determine market abuse	S6	Only requires submission of financial statements?	Effective monitoring and actions by ERC, or any other body?
Market power abuse	S45	Are levels of ownership in all sectors appropriate to prevent monopoly behavior?	To be revised

General comment:

EPIRA's intentions and content is good, clear and well worded. IF you decide to go the market mechanism (and it is still a big IF), it follows the general electricity market trend of a competitive generation and supply sectors, and regulated wires businesses, with a local goal of reducing government debt. An effective market design for electricity is a worldwide issue and we have our own testing conditions. What has created major issues is decision making and behavior of industry participants including the Regulator, and a shortage of generation capacity. There will always be issues of interpretation, and the success of such legislation is up to the players. What has suffered in implementation is risk management, with effectively the majority of risk being passed on to the consumer, in times of outages and shortages. This has to be curtailed