Dear Sirs

Energy Market Investigation: Statement of Issues

We, the undersigned, are all part of the Independent Generators’ Group (IGG) - an informal group of companies, who are working together on some key issues of common interest.

The IGG currently comprises seven major independent merchant generators operating in the UK: Drax Power, Eggborough Power, ESB, GDF Suez, InterGen, Macquarie (MPF Holdings) and Vitol (VPI Immingham). Collectively the IGG members:

- contribute over 25% of UK’s capacity and generation;
- have interests in a wide range of technologies including, gas, coal, pump-storage, and renewables;
- provide employment for several thousand skilled people, directly and indirectly;
- are investing heavily in improving their existing assets, and also in a wide range of new generation projects both small and large, thermal and renewable; and
- includes a number of strong international companies, with knowledge and experience across different markets.

The IGG’s objective is to provide a more focussed and effective voice to better represent the views of an important group within the UK electricity industry. For example, the IGG has for a number of years had meetings with Ofgem and DECC to argue for reforms to improve liquidity in the wholesale electricity market to encourage new entry/expansion.

We support the decision to make a market investigation reference in respect of the supply and acquisition of energy in Great Britain and welcome the opportunity to make appropriate representations collectively and individually to the Competition and Markets Authority (the “Authority”) regarding the matters highlighted in the proposed Statement of Issues.
We believe the Statement of Issues provides an appropriate and comprehensive scope. We urge the Authority to engage fully with independent generators throughout this investigation to ensure that a wide range of views are considered.

Yours faithfully

David Love  
Head of Policy and Regulation  
For and on behalf of Drax Power

Alastair Tolley  
Head of Policy and Regulation  
For and on behalf of Eggborough Power

Clare Duffy  
UK General Manager  
For and on behalf of ESB

Chris Elder  
Director, Strategic Execution  
For and on behalf of InterGen
Gordon Parsons
Chairman
For and on behalf of MPF Holdings

Russell Hardy
Chairman, VPI Holdings Limited
For and on behalf of VPI Immingham