

Single Electricity Market

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| Final REcommendation Report  *Mod\_17\_11: clarifying the requirement to provide dispatch instruction for generator units*  17 January 2012 |

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Document History

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| **Version** | **Date** | **Author** | **Comment** |
| 1.0 | 11 January 2012 | Modifications Committee Secretariat | Issued to Modifications Committee for review and approval |
| 2.0 | 17 January 2012 | Modifications Committee Secretariat | Issued to Modifications Committee for review and approval |

Reference Documents

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| **Document Name** |
| [Trading and Settlement Code](http://semopub/MarketDevelopment/MarketRules/TSC.doc) |
| [Agreed Procedure 6](http://semopub/MarketDevelopment/MarketRules/AP06.doc) |
| [Mod\_\_17\_11 Clarifying the requirement to provide Dispatch Instruction for Generator Units](http://semopub/MarketDevelopment/ModificationDocuments/Mod_17_11.docx) |
| [Mod\_17\_11\_v2 Clarifying the requirement to provide Dispatch Instruction for Generator Units](http://semopub/MarketDevelopment/ModificationDocuments/Mod_17_11.docx) |

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# 1 MODIFICATIONS COMMITTEE RECOMMENDATION

## Recommended for approval – Unanimous Vote

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| --- | --- | --- |
| **Recommended for Approval**  **Mod\_17\_11\_v2 (Unanimous Vote)** | | |
| Gill Bradley | Generator Alternate | Approve |
| Iain Wright | Supplier Member | Approve |
| Ian Luney | Generator Member | Approve |
| Jill Murray | Supplier Member | Approve |
| Kevin Hannafin | Generator Member | Approve |
| Killian Morgan | Supplier Member | Approve |
| Mary Doorly | Generator Alternate | Approve |
| William Steele | Supplier Member | Approve |

# 2 Background

This Modification Proposal was originally raised by Airtricity and was received by the Secretariat on 22 November 2010. The proposal affects Appendix E and O of the T&SC and Agreed Procedure 6. It was first presented at Meeting 36 on 09 June 2011 where it was deferred with an action placed on the SOs and SEMO to procure an Impact Assessment (IA). It was discussed at Meeting 37 on 09 August 2011 where it was again deferred pending a further IA to be attained by SEMO, and an action was placed on the proposer to submit an alternative version. At Meeting 38 on 11 October 2011 the proposal was again deferred. The proposer submitted an alternative version of the Modification Proposal, which was presented and voted on at Meeting 39 on 06 December 2011.

# 3 PURPOSE OF PROPOSED MODIFICATION

## 3A.) Justification for Modification

There is no explicit restriction on the provision of Dispatch Instructions for Autonomous Generator Units, Interconnector Units or Interconnector Residual Capacity Units in the market rules. However for the reason that the Market Operator does not need the data for Instruction Profiling, as well as for the existing technical situation wherein if the Dispatch Instructions were issued to the Market Operator for those classes of Generator Units, the market systems would automatically procure Instruction Profiling for them, in practice Dispatch Instructions are not sent to the Market Operator.

While we accept that Instruction Profiling does not need to be performed for those classes of Generator Units, it does not necessarily follow that the Dispatch Instructions relating to them should not be received by the Market Operator and published in the Central Market Systems as the relevant data for other classes of Generator Units are published. In essence, while the Market Operator may not need the data for its operations, Market Participants do need the data for their own purposes which include the monitoring of generation assets in relation to TSO dispatch actions. For these purposes the Market Operator would be functioning in its role as a central information clearing agent.

## 3B.) Impact of not Implementing a Solution

If this modification is not approved, the faulty logic applied to the provision of Dispatch Instructions for certain classes of Generator Units by implicitly linking it to the Code obligation to not perform Instruction Profiling for those classes of Generator Units will be allowed to continue. This would be contrary to the Code Objectives regarding facilitation of participation of electricity undertakings (Objective 3), transparency (Objective 5) and ensuring no undue discrimination between persons who are parties to the Code (Objective 6).

## 3c.) Impact on Code Objectives

This modification will further objectives #3, #5 and #6 of the code objectives:

* to facilitate the participation of electricity undertakings engaged in the generation, supply or sale of electricity in the trading arrangements under the Single Electricity Market;
* to provide transparency in the operation of the Single Electricity Market; and
* to ensure no undue discrimination between persons who are parties to the Code.

# 4 assessment of alternatives

One alternative was delivered over the lifespan of the proposal. The original version of the proposal ([Mod\_17\_\_11](file://em-prcfs01.corp.aime.local/Common$/Aime/Market%20Development/Mods%20Panel/ALL%20MOD%20DOCS%20BY%20MEETING/2011/Meeting%2039/FRRs/3.to%20facilitate%20the%20participation%20of%20electricity%20undertakings%20engaged%20in%20the%20generation,%20supply%20or%20sale%20of%20electricity%20in%20the%20tradi)) and the Alternative version of the proposal ([Mod\_17\_11\_V2](file://em-prcfs01.corp.aime.local/Common$/Aime/Market%20Development/Mods%20Panel/ALL%20MOD%20DOCS%20BY%20MEETING/2011/Meeting%2039/FRRs/3.to%20facilitate%20the%20participation%20of%20electricity%20undertakings%20engaged%20in%20the%20generation,%20supply%20or%20sale%20of%20electricity%20in%20the%20tradi)) are available from the SEMO website.

# 5 working group and/or consultation

N/A

# 6 Impact on Other Codes/Documents

N/A

# 7 Impact on systems and resources

Upon implementation of the proposal, there will be an impact to systems to extend the publication of DI for more classes of generators. Resource impacts should be once off, for implementation. SEMO processes and procedures shouldn’t be greatly impacted as these reports are already published for certain classes of generators. The IA for the D + 3 Report had been confirmed by the vendor as costing €22,940.

SO Member informed the Committee that there is a 9-10 week implementation time line and a cost associated with this Modification for the NI System Operator, which will be approximately 20-30k.

# 8 MODIFICATION COMMITTEE VIEWS

## Meeting 36 – 09 June 2011

The Modification Proposal was first presented at Meeting 36 on 09 June 2011. The Chair introduced the proposal advising that its intention was to ensure that Generators would be able to receive Dispatch Instructions (DIs) for Autonomous Generator Units from the Market Interface. SEMO advised that DIs are published on D+1 but not on D+3, however the Market Operator don’t receive DIs for all Autonomous Units.

The proposer questioned whether the information would be published if it became available to the Market. SEMO Member advised that DIs for Autonomous Units are not profiled in the Instruction Profiler and are not published by SEMO as they are not used in the market. It was thought that the change may have required both SO and MO systems changes to implement. The Committee agreed to defer the proposal while SEMO and the SOs procured an Impact Assessment.

## Meeting 37 – 11 october 2011

At Meeting 37, SO Member advised that the TSO is in favour of Impact Assessing the D + 3 report as opposed to the D + 1 report. Discussion arose around the issue of the data published compared to that of what is used. SEMO Alternate advised that this data is not utilized by the SEM. An action was placed on SEMO to attain an IA for the D + 3 report and on Airtricity to submit an alternative version of the proposal.

## Meeting 38 – 09 June 2011

At the Meeting, SEMO Alternate advised that although no alternative wording had been received from Airtricity, the IA for the D + 3 Report had been confirmed by the vendor as costing €22,940. Supplier Alternate advised that if the Committee deferred the proposal the alternative version would be submitted in time for the next Meeting. The Chair queried as to whether it would be necessary to initiate another IA when the alternative version was received. SEMO confirmed that this would not be necessary. An action was placed on Airtricity to submit an alternative version of the proposal in advance of Meeting 39 if they wished to proceed with the proposal.

## Meeting 39 – 06 december 2011

At Meeting 39 the proposer introduced the alternative version of the proposal noting that the only difference is that the provisions are extended to include the D + 3 reporting as per the original assessment by SEMO. MO Member advised that autonomous dispatch instructions are not used within the market and the MO usually only publishes data used in the market. SO Member informed the Committee that there is a 9-10 week implementation time line and a cost associated with this Modification for NI which will be approximately 20-30k. SEMO further added that setting a precedent of publishing information not used by the market is not preferable. Proposer stated that the market is not for SEMO but rather Participants. Generator Member asked if the information is available from the Participant systems. Proposer representatives advised that access to the information is only available through SCADA which the operations team receive; it is easier accessed if published. Supplier Member agreed that setting a precedent was not preferred.

# 9 proposed legal drafting

As set out below in Appendix 1 of this report.

# 10 LEGAL REVIEW

Complete

# 11 IMPLEMENTATION TIMESCALE

The proposed implementation date is on a Settlement Day basis in line with the next available CMS Release.

# Appendix 1: alternative proposal

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| --- | --- | --- | --- | --- | --- |
| **MODIFICATION PROPOSAL FORM** | | | | | |
| **Proposer**  *(Company)* | **Date of receipt**  *(assigned by Secretariat)* | | **Type of Proposal**  *(delete as appropriate)* | | **Modification Proposal ID**  *(assigned by Secretariat)* |
| **Airtricity** | **22 Nov 2011** | | **Standard** | | **Mod\_17\_11\_v2** |
| **Contact Details for Modification Proposal Originator** | | | | | |
| **Name** | | **Telephone number** | | **Email address** | |
| Emeka Chukwureh | | +353-1-655-6589 | | emeka.chukwureh@airtricity.com | |
| **Modification Proposal Title** | | | | | |
| Clarifying the requirement to provide Dispatch Instruction for Generator Units | | | | | |
| **Documents affected** | | **Section(s) Affected** | | **Version number of T&SC or AP used in Drafting** | |
| **T&SC**  **AP** | | APPENDIX E, O  AP 6 | | V 10.0 | |
| **Explanation of Proposed Change**  *(mandatory by originator)* | | | | | |
| The proposed change is to provide for the publishing of Dispatch Instructions for Autonomous Generator Units by SEMO, as is the case for all other classes of generators that receive Dispatch Instructions from the SOs. The initial version of this modification only included this change into the D+1 reports. However following discussions with SEMO, the latest changes are extended to D+3 Dispatch Instruction reports as they are more accurate and complete, as opposed to the D+1 reports which are subject to change and only contain 18 hours of the Trading Day. | | | | | |
| **Legal Drafting Change**  *(Clearly show proposed code change using* ***tracked*** *changes, if proposer fails to identify changes, please indicate best estimate of potential changes)* | | | | | |
| **Table E.6 – Data publication list part 6: updated daily post Trading Day**   |  |  | | --- | --- | | Day after Trading Day, by 16:00 | Dispatch Instruction and SO Interconnector Trades Data Transaction (See Appendix K) |   O.5A Not withstanding the provision in O.5, Dispatch Instructions for Autonomous Generator Units shall be provided by the relevant System Operator to the Market Operator in accordance with Appendix K: “Market Data Transactions” and the Market Operator shall procure to publish the Dispatch Instructions within the Central Market Systems.  **AP06 – Appendix 2**   |  |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | --- | | Daily Dispatch Instructions | G | Day after Trading Day, by 16:00 | - | Y |  | Public Data |  | | | | | | |
| **Modification Proposal Justification**  *(Clearly state the reason for the Modification)* | | | | | |
| There is no explicit restriction on the provision of Dispatch Instructions for Autonomous Generator Units, Interconnector Units or Interconnector Residual Capacity Units in the market rules. However for the reason that the Market Operator does not need the data for Instruction Profiling, as well as for the existing technical situation wherein if the Dispatch Instructions were issued to the Market Operator for those classes of Generator Units, the market systems would automatically procure Instruction Profiling for them, in practice Dispatch Instructions are not sent to the Market Operator.  While we accept that Instruction Profiling does not need to be performed for those classes of Generator Units, it does not necessarily follow that the Dispatch Instructions relating to them should not be received by the Market Operator and published in the Central Market Systems as the relevant data for other classes of Generator Units are published. In essence, while the Market Operator may not need the data for its operations, Market Participants do need the data for their own purposes which include the monitoring of generation assets in relation to TSOdispatch actions. For these purposes the Market Operator would be functioning in its role as a central information clearing agent. | | | | | |
| **Code Objectives Furthered**  *(State the Code Objectives the Proposal furthers, see Section 1.3 of T&SC for Code Objectives)* | | | | | |
| Relevant Code Objectives:   * to facilitate the participation of electricity undertakings engaged in the generation, supply or sale of electricity in the trading arrangements under the Single Electricity Market; * to provide transparency in the operation of the Single Electricity Market; and * to ensure no undue discrimination between persons who are parties to the Code. | | | | | |
| **Implication of not implementing the Modification Proposal**  *(State the possible outcomes should the Modification Proposal not be implemented)* | | | | | |
| If this modification is not approved, the faulty logic applied to the provision of Dispatch Instructions for certain classes of Generator Units by implicitly linking it to the Code obligation to not perform Instruction Profiling for those classes of Generator Units will be allowed to continue. This would be contrary to the Code Objectives regarding facilitation of participation of electricity undertakings (Objective 3), transparency (Objective 5) and ensuring no undue discrimination between persons who are parties to the Code (Objective 6). | | | | | |
| **Working Group**  *(State if Working Group considered necessary to develop proposal)* | | | **Impacts**  *(Indicate the impacts on systems, resources, processes and/or procedures)* | | |
| No. | | | Impact to systems to extend the publication of DI for more classes of generators. Resources impacts should be once off, for implementation. SEMO processes and procedures shouldn’t be greatly impacted as these reports are already published for certain classes of generators. | | |
| ***Please return this form to Secretariat by email to*** [*modifications@sem-o.com*](mailto:modifications@sem-o.com) | | | | | |