



Single Electricity Market

MODIFICATIONS COMMITTEE MEETING MINUTES

MEETING 99
CONFERENCE CALL
18 JUNE 2020
10.00AM – 2.00PM

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Document History

Version	Date	Author	Comment
1.0	25 June 2020	Modifications Committee Secretariat	Issued to Modifications Committee for review and approval
2.0	3 July 2020	Modifications Committee Secretariat	Committee and Observer review complete

Distribution List

Name	Organisation
Modifications Committee Members	SEM Modifications Committee
Modification Committee Observers	Attendees other than Modifications Panel in attendance at Meeting
Interested Parties	Modifications & Market Rules registered contacts

Reference Documents

Document Name
Balancing Market Rules – Trading and Settlement Code & Agreed Procedures
Mod_13_19 Payment for Energy Consumption in SEM for non-energy Services Dispatch
Mod_15_19 Clarification to the description of the role of the Dispute Resolution Board under the TSC
Mod_01_20 PMEA No Energy Action Same Direction as NIV
Mod_04_20 Voting Clarification and additional Transparency
Mod_06_20 Removing the requirement for a Monthly Load Forecast
Mod_07_20 Balancing Modifications Committee Composition and constitution definitions
Market Audit Report
Market Audit Presentation

In Attendance

Name	Company	Position
Modifications Committee (voting members)		
Paraic Higgins (Chair)	ESB	Generator Member
Andrew Burke	Enerco (IWEA)	Supplier Member
Mark Phelan	Electric Ireland	Supplier Alternate
Sinead O'Hare	PPB	Generator Member

Rochelle Broderick	Budget Energy	Supplier Alternate
Cormac Daly	Tynagh	Generator Member
Sean McParland	Energia	Generator Alternate
Ian Mullins	Bord Gais	Supplier Member
Robert McCarthy	Electricity Exchange	DSU Alternate
Eoin Murphy	ElectroRoute	Assetless Alternate
Adelle Watson	NIE Networks	MDP Member
James Long	ESB Networks MRSO	MDP Member
Christopher Goodman	SEMO	MO Member
Anne Trotter	EirGrid	SO Member
Modifications Committee (Non-Voting Members)		
Barry Hussey	CRU	RA Member
Gina Kelly	CRU	RA Alternate
David Gascon	Bord Na Mona	Generator Alternate
Eamonn Boland	Brookfield Renewable (IWEA)	Supplier Alternate
Joe Devlin	PPB	Generator Alternate
Katia Compagnoni	SEMO	MO Alternate
Leigh Greer	Uregni	RA Member
Secretariat		
Sandra Linnane	SEMO	Secretariat
Esther Touhey	SEMO	Secretariat
Observers		
Paul McGuckin	Moyle Interconnector Ltd	Observer
Stacy Feldmann	SSE	Observer
Thomas Quinn	CRU	Observer
John Tracey	EirGrid	Observer
Niamh Delaney	EirGrid	Observer
Thomas O'Sullivan	Aughinish	Observer
Adam Fitzpatrick	CRU	Observer
Rachel Strong	CRU	Observer

Michael Harrington	SEMO	Observer
Mark Needham	SEMO	Observer
Martin Kerin	SEMO	Observer
Andrew Waghorn	Deloitte	Observer
Walter Carlton	Deloitte	Observer

1. AUDIT UPDATE

Deloitte delivered a [presentation](#) on their recent audit noting consultation was provided on the scope of the audit. It was confirmed that Terms of Reference were issued in September 2019 which advised of a change in the approach to how the audit was carried out. The audit period was over 15 months and SEMO’s responsibilities were listed. Deloitte provided details on what the auditors have been testing and this year’s facts arising from the audit. As a result the report was longer with much more detail.

The second part of the presentation reviewed the factual findings and the Presenter advised there were specific questions on requirements. A summary was provided on the findings noting there were a number of issues found with non-compliance to the Code and some process steps which were not followed.

The Chair made a request to have an opportunity to submit any further questions regarding these audit issues following the meeting. It was advised that questions could be sent through the Secretariat or directly to rstrong@cru.ie.

2. SEMO UPDATE

The Secretariat welcomed all to Modifications Committee Meeting 99. The minutes for Meeting 98 were read and approved.

The Secretariat spoke of the upcoming Election process and also noted that there would be a Code Update available in the next couple of weeks.

MOD_03_18 Autoproducer Credit Cover	<ul style="list-style-type: none"> SEMO to provide vendor impact assessment for existing proposal – Ongoing
MOD_13_19 Payment for Energy Consumption in SEM for non-energy Services Dispatch	<ul style="list-style-type: none"> SEMO and the proposer to investigate feasible ways to implement a solution in the market. – Ongoing MDPs and TSOs to continue to explore ways to get the data to the Balancing Market including potential manual options - Ongoing
MOD_14_19 Interconnector Representation on the Modifications Committee	<ul style="list-style-type: none"> RAs to raise Modification Proposal/Proposals considering final comments from working group final review and feedback if deemed appropriate – Closed
MOD_15_19 Clarification to the description of the role of the Dispute Resolution Board under the TSC	<ul style="list-style-type: none"> Secretariat to review interim costing for legal review based on legal points noted above – Closed

<p>MOD_17_19 DSU State Aid Compliance Interim Approach</p>	<ul style="list-style-type: none"> • SEMO take a long term action to undertake mid tariff year (summer 2020) review of the cost of the change on Imperfections Charges post implementation to track any substantial increase in costs- Long Term Action
<p>MOD_01_20 PMEA No Energy Action Same Direction as NIV</p>	<ul style="list-style-type: none"> • SEMO, RAs and members to review EBGL and Clean Energy Package for any interactions – Ongoing • SEMO and Proposer to complete analysis on the impact on Imbalance Pricing and circulate as soon as practicable – Ongoing • SEMO and TSOs to analyze impact on Premium and Discount payments and Imperfections – Ongoing • Members to carry out analysis/investigation to better understand the implications of the proposal and share it with the Panel as soon as available - Ongoing
<p>MOD_03_20 Temporary Modification to Section B.18.3.2 to introduce an RA Approval process for all Suspension Orders</p>	<ul style="list-style-type: none"> • Secretariat to draft Final Recommendation Report – Closed
<p>MOD_06_20 Removing the Requirement for a Monthly Load Forecast</p>	<ul style="list-style-type: none"> • TSO to provide upload Monthly Load Forecast file to new web page location and provide this to Participants – Closed • Participants to test connection for automatic download of test file – Closed • RAs to check with Compliance team whether the changes in publication result in a non-compliance, partial compliance or full compliance – Closed • Participants to review this Modification Proposal at the end of the year to consider whether the Monthly Load Forecast should be retained for forecast assessment in Secondary Trading - Open
<p>System Update</p>	<ul style="list-style-type: none"> • SEMO to check previous publishing process for Change Requests - Closed
<p>Settlement Update</p>	<ul style="list-style-type: none"> • Proposer to quantify the current impact on over-collateralization to Participants is – Ongoing • MDPs to validate and verify processes for Meter data for new units – Ongoing
<p>Settlement Update</p>	<ul style="list-style-type: none"> • MDPs to validate and verify processes for Meter data for new units - Closed

3. DEFERRED MODIFICATION PROPOSALS

MOD_13_19 PAYMENT FOR ENERGY CONSUMPTION IN SEM FOR NON-ENERGY SERVICES DISPATCH

The Proposer delivered a [presentation](#) on this Modification noting that not all generator modes are modelled in SEM and this should be accounted for rather than having out of market contracts. The Proposer advised that it was known the proposed new solution would not be straightforward. The Proposer went through the slides examining the different solutions which had been considered.

The Proposer advised that Solution 1 whereby a new Dispatch Instruction type would be created appeared to be the most ideal solution but there would be complexity around this. It was noted that the general feedback from Market Operations would be that the cost would be expected to be high as there was a change to Instruction Profiling and a number of systems were affected. Therefore other alternatives were looked at.

Of the other solutions that were presented, Option 4 was the one with most promise and would likely be faster and easier than Option 1. It was proposed by a Participant in the context of windfarms but could also be applied to other units.

The Proposer advised that more time would be needed to go through all of the solutions and made a recommendation that a Working Group be convened to discuss the solutions submitted and any other viable ones.

There was support from a number of Members for a Working Group to take place with an agreement that this is a complex area and getting wider industry involved is a good idea. The Secretariat advised the Committee that the earliest this Working Group could be convened would be late September / early October due to other conflicting works. It was suggested that a conference call could be organised before the Working Group is formalised to go through the solutions in more detail and have a stronger base for the Working Group. There was an agreement amongst Committee Members that this was a sensible option and would make the Working Group more productive.

An RA Member made a point regarding solution 4 noting that there was a requirement for Trading Site Supplier Units (TSSUs) to hold a supply licence and this would need to be explored further in any future discussions.

A Generator Member stated that they previously made the point that this was a DS3 issue and they still stand by it. A suggestion was made that a tariff should be developed for people to sign up to and this would also be transparent. A discussion ensued with a point raised by the Proposer that energy consumption needs to be accounted for while the TSO noted that part of the rationale for a market treatment is that this approach could lead to saving in Imperfections as it would lead to less thermal units being re-dispatched.

A Representative from Aughinish gave support for the Modification noting they were looking at a new technology that would benefit from this. A request was made to progress Option 1 also in parallel. The Proposer advised it would depend on what the interim solution would be. The interim solution would need to be implemented as quickly as possible while covering as best as it can the aim of the potential enduring solution. No option was off the table but practicalities of implementation and Impact Assessments had to be considered.

Decision

This Proposal was deferred.

Actions:

- Secretariat to convene a Working Group in September / October 2020– **Open**
- Proposer to set up conference call ahead of working group to explore further and inform Terms of Reference for Working Group - **Open**
- Proposer to provide an update at the August Meeting – Legal drafting to be progressed to lead on to WG in September / October - **Open**

MOD_15_19 CLARIFICATION TO THE DESCRIPTION OF THE ROLE OF THE DISPUTE RESOLUTION BOARD UNDER THE TSC

The Secretariat provided an update on the action from this Modification noting that approval has been sought from the RAs to procure legal advice in order to develop this Modification and once this is received actions will be taken accordingly. The RAs advised that they were currently in discussion with SEMO around concerns on the budget. The intention is to approve the procurement with an initial cap of €25k with an option to increase that if there would be a further follow up required. The Secretariat provided assurance that the Legal team will be involved in these negotiations and advised that members will be updated where possible.

Decision

This Proposal was deferred.

Actions:

- Secretariat to provide update on progress of this Modification once approval received from the RAS to proceed with procurement - **Open**

MOD_01_20 PMEA NO ENERGY ACTION SAME DIRECTION AS NIV

SEMO provided an update on the action for this Modification noting that a spreadsheet was circulated with analysis compiled by SEMO to illustrate the potential impact on Price by this Modification Proposal. The analysis showed that, whilst the impact was not a systematic increase or decrease in Imbalance Prices, there was an indication that net Imbalance Charges were higher in the sample period analysed. A SEMO Member noted a separate action to investigate Imperfections impact and indicated that it had not been possible to complete a detailed analysis of this to date due to the complexity involved. They advised that the System Operator had indicated that there was nothing immediately obvious in the price changes indicating a large impact via Premium and Discount charge changes which a System Operator Member confirmed. The SEMO Member went on to note that because the impact on imperfections is also dependant on bid/offer acceptance quantities and associated prices it is not possible to accurately quantify the impact there without carrying out a detailed analysis so it was not possible to state with certainty at this point what that impact would be.. SEMO advised that the analysis completed was already a sizeable undertaking and while the corresponding analysis on Imperfection (including Premium and Discount) was not completed, asked if the Committee felt that what has been provided was sufficient or whether they would also require this further detail. They noted that this further analysis would require a substantial effort so that it should only be undertaken if necessary.

There was an agreement from the Committee that they felt the data provided was good and gave assurance that the Modification was doing as it was designed to do.

A Supplier Member noted that it seems from the initial data that the impact on imperfections wouldn't be big as there aren't large outliers or systematic impacts in the Imbalance Price variations and asked SEMO if they could confirm that the impact on Imperfections was small. The SEMO Member acknowledged the absence of a systematic impact on the Imbalance Price but reiterated that the impact on Imperfections could not be stated with certainty given the dependence on other variables. A discussion ensued around the overall impact of seasonal factors on the period analysed and whether or not the impact would likely be lesser in Summer given that the sample analysed was during Winter. SEMO advised that the main driver would be the overall change in Imbalance Prices and the Net Imbalance Volume (NIV) which is not dependent on total demand and is therefore not really seasonal. They noted that the observed change in net Imbalance Charges in the sample analysed is an increase which could occur throughout the year and wouldn't be that closely linked to seasonal changes. Some Members asserted that in their view the change provided more incentive for Participants to act in a way that improves market balance and that therefore the Modification resulted in a clearer and more appropriate pricing signal. A SEMO Member noted that the view expressed seemed to be that the Imbalance Price signal should predominantly or solely reflect an incentive to improve balance based only on the direction of the NIV and that there are other considerations that could be taken into account in determining what the appropriate price signal is.

An Assetless Alternate queried the implementation time for this Modification and if there was currently a backlog to implement. SEMO confirmed it was not possible to say when the implementation would occur if the Modification were to be approved but that it was most likely that the first available slot would be in Release H scheduled for October 2021. SEMO advised that there was a process for prioritising changes when determining each release scope that would have to be carried out before it could be determined when any change would be implemented. It was also noted that the market dynamics that prompted the proposal could change in the meantime due to new technologies on board, such as Batteries, potentially making the proposal redundant prior to its implementation.

SEMO noted that there was also a further action to review potential interactions between the proposed Modification the Electricity Balancing Guideline (EBGL). The RAs advised that they were continuing to attend weekly meetings to review compliance with EBGL and confirmed that decisions are evolving through ACER. Assurance was provided that this Modification can be considered on its own merit while this work progresses separately. The RAs advised that more concrete views are available and before decisions are made on Code compliance with EBGL, they would be engaging further with Market Participants.

The Chair gained agreement from the Committee that enough information was provided to proceed to a vote.

Decision

This Proposal was Recommended for Approval.

Recommended for Approval by Unanimous Vote		
Paraic Higgins (Chair)	Generator Member	Approve
Andrew Burke	Supplier Member	Approve
Mark Phelan	Supplier Alternate	Approve
Sinead O'Hare	Generator Member	Approve
Rochelle Broderick	Supplier Alternate	Approve

Cormac Daly	Generator Member	Approve
Sean McParland	Generator Alternate	Approve
Ian Mullins	Supplier Member	Approve
Robert McCarthy	DSU Alternate	Approve
Eoin Murphy	Assetless Alternate	Approve

Actions:

- Secretariat to draft Final Recommendation Report - **Open**

MOD_04_20 VOTING CLARIFICATION AND ADDITIONAL TRANSPARENCY V2

The Proposer provided a summary of the Modification and confirmed all changes were implemented as discussed from Meeting 98.

A Generator Member raised a question around the process for an additional round of voting and the process if there is a tie. The Proposer confirmed that a second round of voting would occur and although it may not seem clear in the steps it would not cause a hindrance to completing them. A Supplier Alternate also noted that there seems to be a lack of consistency in steps 7 A to 8 in the event of a tie on the final vote. The Proposer took these points on board and agreed to a minor update the legal drafting to add clarity in the AP Notification.

Decision

This Proposal was Recommended for Approval subject to legal drafting.

Recommended for Approval by Unanimous Vote		
Paraic Higgins (Chair)	Generator Member	Approve
Andrew Burke	Supplier Member	Approve
Mark Phelan	Supplier Alternate	Approve
Sinead O'Hare	Generator Member	Approve
Rochelle Broderick	Supplier Alternate	Approve
Cormac Daly	Generator Member	Approve
Sean McParland	Generator Alternate	Approve
Ian Mullins	Supplier Member	Approve
Robert McCarthy	DSU Alternate	Approve
Eoin Murphy	Assetless Alternate	Approve

Adelle Watson	MDP Member	Approve
James Long	MDP Member	Approve
Chris Goodman	MO Member	Approve
Anne Trotter	TSO Member	Approve

Actions:

- Proposer to make minor change to legal drafting in AP Notification for AP13 3.3 on step 7(a): ‘In the event of tie or inconclusive election results *in the final count after tie break round*, go to step 8, – **Open**
- Secretariat to draft AP Notification - **Open**

MOD_06_20 REMOVING THE REQUIREMENT FOR A MONTHLY LOAD FORECAST

SEMO provided an update on this Modification noting that two actions that arose from this have been closed. TSO confirmed that the report was published last month on the SEMO website inviting Participants to test their own connectivity to the new location, and the RAs have confirmed that no issues will be raised with compliance due to the changes in the publication page.

SEMO advised that this Modification was deferred pending Secondary Trading being set up as more time was needed by Participants to consider the utility of this feed for that purpose.

A Generator Member noted following COVID-19 and consequent impacts on demand that they felt that the value of the Monthly Load Forecast data was elevated. It was noted that a monthly forecast could be a lot more accurate than an annual forecast due to changes in consumption resulting from measures taken due to Covid. TSO assured the Committee that this monthly forecast can continue to be published manually in the meantime on their section of the SEMO website. A further action regarding how Members are finding the new format was noted with agreement that comments on this would be available for the next Modifications Meeting in August.

Decision

This Proposal was deferred.

Actions:

- Members to provide any issues or comments on new publishing system for monthly load forecast at next Modifications Meeting - **Open**

4. NEW MODIFICATION PROPOSALS

MOD_07_20 BALANCING MODIFICATIONS COMMITTEE COMPOSITION AND CONSTITUTION DEFINITIONS

The Proposer provided a background on this Modification noting that it arose out of concerns raised by Mod_14_19 and subsequent Working Groups. The Proposer advised that this Modification would not come into effect until the new Modifications Committee had been elected.

The Proposer highlighted some small errors on the Modifications and made reference to B.17.7.4 which would be corrected. The slides were delivered and it was confirmed that the option to provide a dedicated renewable seat did not receive overall support. The Committee was briefed on the second part of the Modification which related to changing definitions for Generator Participants categories to include representation of Interconnector Owners and changing also to the definition of Supplier Participants to make sure that Suppliers with end consumers would be represented.

A Supplier Member voiced concerns that this Modification did not represent what was discussed in both Working Groups and there was disagreement that Interconnectors should be included with Generators as it restricts industry representation.

The Proposer reminded the Committee that a comments forum had been created following the Working Groups and there were no suggestions received from the Committee on where Interconnectors should be placed as currently they are not represented by any of the Members on the Panel. It was also noted that there was no clear outcome from the Working Groups.

A number of Members expressed their unease with this Modification noting that what is proposed was not one of the recommendations from the Working Groups. An Observer expressed his satisfaction with this Modification advising that Members now have a mandate to represent Interconnectors allowing their interests to be voiced even without having a dedicated seat.

A Generator Member expressed their opinion that Generators interests are not necessarily the same as Interconnectors and therefore they could not represent them without conflict with their current mandate. A discussion ensued with a point raised by the Proposer that according to the T&SC Members must represent all those in their constituency.

An Observer voiced their concerns about Interconnectors being included within the definition of Generator Participants as this may compress the Generator group too tightly. Their understanding was for a renewable seat to be included not an Interconnector on top of that. There was further agreement from another Generator Alternate that this Modification would not improve the situation and cause less of a balance by trying to group different types in the same category.

The Chair asked for views from Suppliers for the other element of the modification with regards to the definition of Supplier which was broadly welcomed by a number of Supplier Members. A number of Supplier Members and Alternates agreed that Interconnectors should not have a seat noting that they can still be represented without one. One Generator Member agreed that the outcome of the Working Groups was not clear and accepted that finding a solution would be challenging. It was noted that Generators do have some of the same interests as Interconnectors but it was advised that if there a change to include Interconnector representation within the Generator Members they would likely not get elected due to the proportion of Generators voting relative to the number of Interconnector Owners. The view that if Generators have to consider Interconnectors as a constituency this would cause a conflict with their primary constituents which are Generators and therefore lead to an imbalance was also put forward.

The RAs reminded the Committee that Mod_14_19 was rejected unanimously and following this a solution needed to be found on how Interconnectors should be represented. It was felt that more focus seemed to be given on ways in which they shouldn't be represented and as a result there was not a strong argument against the basis of this proposal in terms of representation being appropriate and not currently being in place.

Another Generator Member suggested that Interconnectors and Assetless Members have stronger similarities and could be put together. The Assetless Alternate disagreed advising that if a vote was to occur their interests would not necessarily be aligned.

The SEMO Member stated that since there had not been consensus from the Working Groups, with attendees disagreeing on a number of points, that it was unlikely to be possible to reflect everyone's view of the Working Group outcome in a Modification Proposal since these were at times contradictory. They noted that some Working Group attendees had stated that they felt that Interconnector Owners interests were already represented by Generator Members as an argument against the need a dedicated Interconnector Seat on the Committee. They also noted that Members are already at times obliged to represent interests

which are not necessarily their own citing examples of Generator Members whose organisations only operate Dispatchable Generator Units being obliged to represent the interests of non Dispatchable Generator Units.

A DSU Alternate addressed another part of this Modification where there was a change in the definition of Supplier Members. A question was raised if the new definition was leaving Trading Site Supplier Units (TSSUs) without representation and therefore creating a new problem similar to the one the Interconnector Owners are trying to solve. The Proposer acknowledged this point and advised that it was not their intention to preclude such representation and as such they would consider ways to address via revised legal drafting.

A discussion ensued around definitions for Suppliers, Generators and Renewables and how to define renewable. A Supplier Member indicated that fuel types could potentially be used for a renewables definition and noted that these are published on the SEMO website. A SEMO Member noted that aside from the issue of how to define a renewable Member there was the question of whether or not it was appropriate to ring fence one Generator Type noting that there are other Generator types such as storage which do not have dedicated seat. They noted that it could be considered discriminatory to ring-fence one Generator Member type and not others. The Chair advised that there was a risk of re-visiting previous discussions and not focusing on how to move this Modification forward. The Secretariat agreed and also noted that action arising from the Working Group was for the RAs to draft a Proposal taking feedback received into consideration.

A Supplier Alternate [asking to make a contribution as an Observer](#), noted ~~that renewables held over 30% of generation and asked if they were very different to conventional generators. It appeared, in their view, that guidelines on what would merit new representation on the committee might be useful, suggesting a materiality test, and confirmation that any new category is not already represented. Renewables were then used as an example, noting that renewables held over 30% of generation and were materially different to conventional generators. were missing on materiality and a test was needed to see if they were represented already.~~ The RAs noted that it was very clear renewables were being represented by a Supplier Alternate when raising this point and stressed that they felt that this was not appropriate given the obligations taken on as a Supplier Members on the Modifications Committee under the Code to represent their constituency. This was why clarifying the issue of what interests must be represented by Supplier Members was included in the proposal. A Supplier Member noted that the Supplier Alternate, [speaking as an observer](#), had indicated that they were representing a particular organisation prior to making the comment and that they were therefore commenting in a different capacity to that of a Supplier Alternate. The RAs indicated that the Supplier Alternate was obliged to represent Supplier Participants at the Modifications Committee. [The Supplier Alternate then re-iterated that their contribution was as an observer using renewables as an example to illustrate a principle.](#)

A suggestion was made by a Generator Member to separate out the number of changes in this Modification into separate Modifications. There was a general agreement on this with the RAs agreeing it will help to move some issues forward. Secretariat reiterated that this Modification would be withdrawn with 2 new Modifications to be raised addressing the below issues with the Proposer to consider whether any consolidation of issues is appropriate prior to raising them:

- Increase in number of seats
- Supplier definitions – all categories
- Interconnector representation
- Renewable Generator seat

RA Member also wished it to be noted that the Proposal would be withdrawn begrudgingly and expressed their disappointment at the sentiment expressed by Members who it would appear were acting on behalf of their respective organisations rather than their elected member types.

A Supplier Member expressed their concern at the RAs sentiment and assured of their best endeavours. The Secretariat noted the importance of working on progressing these issues between Committee meetings advising that little or no responses were received following calls for comments after the Working Groups and subsequent minutes from Meeting 98 between the proposal being circulated and the meeting itself.. The RAs expressed that splitting the items would be done for pragmatic reasons as there were some

concerns raised on the balance of the Committee. The RAs also noted that they did not feel that the arguments against their proposals were strong enough to dissuade them from pursuing the changes they had presented. The Chair advised that these Modifications should highlight the elements above so that a more constructive conversation could happen on each.

Decision

Actions:

- Proposer to split out elements of the proposal into 2 new distinct proposals as appropriate and withdraw Mod_07_20 - **Open**
- Secretariat to draft Withdrawal Notification for Mod_07_20 – **Open**

5. AOB/UPCOMING EVENTS

MARKET DEVELOPMENT UPDATE

A [presentation](#) was provided on the Market Development Roadmap which is due to be issued at the end of the month and will be open for consultation until the end of July. The Market System Development plan will be registered and published in 6 weeks.

The Presenter then went through the slides covering upcoming releases noting that release F would be in October 2020 with 4 Modifications on schedule. The Modifications are Mod_10_19, Mod_19_19, Mod_21_19 and Mod_17_19. Confirmation was given that testing, development and design has been completed. Scope for Release G scheduled in April 2021 is due to close shortly.

SETTLEMENT UPDATE

The Presenter went through the [slides](#) of a potential Modification providing live examples on where there has been processing issues resulting in publishing delays of Indicative Settlement reports in April. It was explained that this causes significant delays in processing which peaked on 16th April. The delay of that week added 15 million to Traded Not Delivered (TND) exposure. It was advised that 70% related to Participants who would have enough collateral to cover the excess. It was noted that these were only on the Generator side

The Presenter assured that this potential Modification would be relatively straightforward to implement with no system changes required and the credit report would not be altered but left to the last credit report of the day.

A discussion ensued around the details of this Modification and the fact that it was trying to match Ex-Ante Quantity (QEX) to meter volumes instead of the Accepted Offer Quantity (QAO). A question was raised by a DSU Alternate regarding the matching of meter volumes and would there be a penalty if they were constrained down. The proposer explained that Dispatch Quantity would be taken into consideration which should alleviate such concerns. It was advised that there would be a level of forecasting error but that would be inevitable and that previous percentages of matching would not be adequate in this context. A supplier representative praised the efficiency of the solution and would welcome practical examples of the implementation with the Modification raised at the next meeting.

SEMO provided an update on an action relating to zero meter volumes where metering was not validated for new DSO connected units. It was confirmed that internal discussions with ESNB had taken place and any new units would have the data released as it is as soon as available from connection. It was noted that the only caveat is that this is non validated data and might change with M+4 submissions. A question was raised if the data released was just generation or if supply could be included also. The MDP Member

advised that it would be reviewed how well this goes firstly. A second MDP Member also advised that this was not an issue for NI as such data is already sent to SEMO.

The Secretariat thanked all for the attendance to Meeting 99 and noted that the next meeting will take place on Thursday, 20th August 2020.

APPENDIX 1 – PROGRAMME OF WORK AS DISCUSSED AT MEETING 99

Status as at 18 June 2020		
Modification Proposals 'Recommended for Approval' without System impacts		
Title	Sections Modified	Sent
Mod_05_20 Provisions for the Settlement of CEADSU	Section H	Sent for RA decision 10/06/20
Mod_04_20 Voting clarification and additional transparency	AP 3	FRR to be drafted
Mod_01_20 PMEA No Energy Action Same Direction as NIV	E.3.4.2	FRR to be drafted
Modification Proposals 'Recommended for Approval' with System impacts		
Mod_03_18 Autoproducer Credit Cover	G.12.4.4, G.14.7.3, G.14.7.3A, G.14.7.4, G.14.7.5, G.14.7.6, G.14.7.7 G.14.8.1, G.14.10.1, G.14.10.2, G.14.10.3, G.14.10.4, G.14.15.6 and G.15.1.1	Sent for RA decision 07/01/20
Modification Proposals 'Recommended for Rejection'		
Mod_14_19 Interconnector Representation on the Modifications Committee	T&SC B.17.3, B.17.7, B.17.8 and Glossary AP12 3.7 and Appendix 1	Sent for RA decision 10/06/20
RA Decision 'Further Work Required'		
N/A	N/A	N/A
RA Decision Approved Modifications with System Impacts		
Mod_03_19 Amended application of the Market Back Up Price if an Imbalance Price(s) fails to circulate V2	E.2.2.4 and E.5.1.3	Effective on System Implementation
Mod_05_19 Amendment to Uninstructed Imbalance Charge (CUNIMB) to correct for Negative Price Scenarios	F.9.4.1 Part B Glossary List of Variables and Parameters	5 July 2019
Mod_07_19 Correction to No Load Cost "and" vs "or"	F.11.2.3	3 May 2019
Mod_08_19 Clarification to Intraday Difference Quantity and Payment	F.20.2.3	27 Sept 2019
Mod_09_19 Removal of locational constraints from Imbalance Pricing calculation	Appendix N.1	2 May 2019
Mod_10_19 Removal of negative QBOAs related to dispatchable priority dispatch units from the imbalance price	Part B Section D New Paragraph D.4.4.12	Oct 2020 (possible system implementation)
Mod_11_19 Correction to the determination of COP	F.11.2.5, F.11.3.1	27 Sept 2019

and clarification of CNLR		
Mod_12_19 System Service Flag for Demand Site Units	F.18.6	13 Nov 2019
Mod_17_19 DSU State Aid Compliance Interim Approach	F and H	1 October 2020
Mod_19_19 Determining use of Complex Commercial Offer Data in Settlement when Required Information is not Available	F.3.3.2	Effective on System Implementation
Mod_20_19 Changing Day-ahead Difference Quantity to Day-ahead Trade Quantity in Within-day Difference Charge Calculations	F.18.5	Effective on System Implementation
Mod_21_19 Loss Adjustment Factor for Interconnectors	F	Effective on System Implementation
Mod_22_19 Correction of QUNDELLOTOL calculations to convert TOLUG and TOLOG to MWh	F	Effective on System Implementation
RA Decision Approved Modifications with no System Impacts		
Mod_33_18 Update to Unit Under Test Process	Part B Section D.7.3 Part B Appendices F and J Part B Glossary Definitions related to Under Test status Part B Agreed Procedure 4 Sections 2.4 and 3	2 July 2019
Mod_01_19 Negative Interest in the SEM	Section 6.16-6.19 & 6.35 AP-17 Banking and Participant Payments Section G.1.4.3 to G.1.4.5 & G.1.5.1 AP-17 Banking and Participant Payments	2 May 2019
Mod_16_19 Codification of TSO FNDDS Methodology and System Service Flag for DSU Settlement	F.2.7	28 February 2020
Mod_18_19 Clarification to apply Recoverable Start Up Costs to DSUs	F.11.2.2 /4/6	28 February 2020
Mod_23_19 Modification to allow the Market Operator to seek relief from an obligation under Section E.3 of the TSC in exceptional circumstances (until 1 January 2021)	H.6, B.14, E.3	07 February 2020
Mod_24_19 Amendments to Unsecured Bad Debt and Suspension Provisions Related to Supplier of Last Resort	G.2.7	28 February 2020

	Agreed Procedure 15	
Mod_02_20 Housekeeping Feb 2020	Part B B.12.1.3, F.2.1.8, G.2.10.2, G.2.10.8, H.7, H.8, H11 Part B Glossary, Part B Appendix O.17, Part B AP09 2.11.2 and AP12 3.7, Part C (note)	26 May 2020
Mod_03_20 Temporary Modification to Section B.18.3.2 to introduce an RA Approval process for all Suspension Orders	Section B.18.3.2 Agreed Procedure 18	29 April 2020
RA Decision Rejected		
Mod_38_18 Limitation of Capacity Market Difference Payments to Metered Demand	F.20.1.1	12 November 2019
AP Notifications		
Mod_04_19 Running Indicative Settlement on all days	2.5.1	AP Notification sent 29/11/19
Withdrawal Notifications		
Mod_32_18 Removal of exposure for in merit generator units against BOA	Appendix N	05 July 2019
Mod_06_19 Determination of the Marginal Energy Action Price where no energy is available in the Net Imbalance Volume	Section E.3.4	17 October 2019
Modification Proposal Extensions		
Mod_03_18 Autoproducer Credit Cover	G4 to G15	Extension approved 04/07/19
Mod_13_19 Payment for Energy Consumption in SEM for non-energy Service Dispatch	T&SC Part A/Part B/Part C Appendices Part A/Part B Glossary Part A/Part B/Part C Agreed Procedures Part A/Part B	Extension approved 09/04/20
Mod_14_19 Interconnector Representation on the Modifications Committee	T&SC B.17.3, B.17.7, B.17.8 and Glossary AP12 3.7 and Appendix 1	Extension approved 09/04/20
<ul style="list-style-type: none"> Meeting 100 – 20 August 2020 – Conference Call 		