



## Single Electricity Market

### MODIFICATIONS COMMITTEE MEETING MINUTES

MEETING 109

CONFERENCE CALL

17<sup>th</sup> February 2022

10.00AM – 2.00PM

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**Document History**

Version	Date	Author	Comment
1.0	17 <sup>th</sup> Feb 2022	Modifications Committee Secretariat	Issued to Modifications Committee for review and approval
2.0	24 <sup>th</sup> Feb 2022	Modifications Committee Secretariat	Committee and Observer review complete

**Distribution List**

Name	Organization
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
<a href="#">Balancing Market Rules – Trading and Settlement Code &amp; Agreed Procedures</a>
<a href="#">Mod_20_21 Undo Instruction Scenario 2</a>
<a href="#">Mod_21_21 Undo Instruction Scenario 4</a>
<a href="#">Mod_04_22 Alternatives to LIBOR</a>
<a href="#">Mod_01_22 Balance Surety Demand Guarantee</a>
<a href="#">Mod_02_22 Cost Recovery when Under Test</a>
<a href="#">Mod_03_22 Collection of Monies v2.0</a>

**In Attendance**

Name	Company	Position
<b>Modifications Committee (voting members)</b>		
Andrew Burke	Wind, Energy Ireland	Renewable Generator Member
David Gascon	Bord no Mona	Generator Alternate
Robert McCarthy	Electricity Exchange	DSU Member
David Caldwell	Power NI	Supplier Alternate
Ian Mullins	Bord Gais Energy	Supplier Alternate
Sean McParland	Energia	Generator Alternate
Paraic Higgins (Chair)	ESB	Generator Member
Nick Heyward	Energy Storage Ireland	Flexible Participant Alternate

Rochelle Broderick	Budget Energy	Supplier Member
Brigid Reilly	PrePayPower	Supplier Alternate
Bryan Hennessy	Naturgy	Supplier Member
Patrick Larkin	ElectroRoute	Assetless Alternate
Stacy Feldmann	SSE	Generator Member
<b>Modifications Committee (non-voting members)</b>		
Karen Shiels	UR	RA Alternate
Grainne Black	CRU	RA Member
Conall Heussaff	CRU	RA Alternate
James Long	ESB Networks	MDP Member
Aoife Mills	EirGrid	SO Alternate
Anne Trotter	EirGrid	SO Member
Adelle Watson	NIE Networks	MDP Member
Stephen McClure	SONI	SO Member
Katia Compagnoni	SEMO	MO Member
Cormac Daly	Tynagh	Generator Member
Martin McCarthy	SEMO	MO Alternate
<b>Secretariat</b>		
Sandra Linnane	SEMO	Secretariat
Esther Touhey	SEMO	Secretariat
<b>Observers</b>		
Edel Leddin	EirGrid	Observer
Gill Nolan	EirGrid	Observer
Tadhg Gunnell	Pinergy	Observer
Philip Blythe	ESB	Observer
Sinead O Hare	Power NI	Observer
Elaine Corcoran	EirGrid	Observer
Gavin O'Brien	EirGrid	Observer

Eamon Garrigan	EirGrid	Observer
John Tracey	EirGrid	Observer
Brian Sherwin	EirGrid	Observer
Christopher Goodman	SEMO	Observer
Brian Malone	EirGrid	Observer

**1. SEMO UPDATE**

Secretariat welcomed all to Modifications Committee Meeting 109. Housekeeping items were discussed, and thanks was given to David Gascon from Bord na Mona for the support given to the Committee over the years as he departs his alternate position.

It was noted that the latest Trading & Settlement Code update is ongoing and will be published in line with the next release which is due in April. The Secretariat advised that the Program of Work had been circulated before the meeting and it reflected the recent RA decision to approve Mod\_19\_21 re 'Publication of Information by SEMO'.

MO Member provided an update on the outstanding actions advising that an Impact Assessment had been received on Mod\_13\_19 and the cost is between medium and high. Assurance was given that it would be included in the scope for Release J subject to RA approval. MO Member also noted that a change request was in process for Mod\_14\_21 and an update would be given on this as soon as the impact assessment is received.

The only outstanding Modification was Mod\_01\_20 with the RA Member advising that following a review of its interaction with EBGL, the conclusion was that it could be progressed, and a decision would be published shortly. Following previous discussion with the RAs SEMO had already included it in Release I with a switch off mechanism in case of a decision to reject, or in case a decision was not received by release implementation date.

Market Development Update

An update was given on the timelines and content of Release I. It was advised that an update was also given at the recent Market Operator User Group. It was noted that several defects had been resolved recently and there were currently only 15 issues outstanding.

Information was provided on Release H.1 with confirmation that CR-244 went live on 26<sup>th</sup> January 2022.

Future Releases were mentioned with a focus given on Impact Assessments and interaction with the vendor once scopes are complete. Questions were asked about the autumn release and if it posed a risk being close to Christmas. It was advised that timelines can be tight around the autumn releases but so far, they have been successfully delivered without major issues. It was noted that SEM focus groups would be set up going forward to discuss Modifications in the pipeline and these forums would help with prioritization. The Committee agreed that this would be useful.

<p>MOD_13_19 Payment for Energy Consumption in SEM for non-energy Services Dispatch</p>	<ul style="list-style-type: none"> <li>Market Operations to progress request for Impact Assessment – <b>Open</b></li> </ul>
<p>MOD_17_19 DSU State Aid Compliance Interim Approach</p>	<ul style="list-style-type: none"> <li>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 - <b>Long Term Action</b></li> </ul>
<p>Mod_14_21 Extension of System Service Flag to include units providing replacement reserve in line with the detailed design</p>	<ul style="list-style-type: none"> <li>SEMO to provide further explanation on how the flag is currently set for replacement reserve – <b>Closed</b></li> <li>Proposer to consider legal drafting to include a limb 3 in the clause – <b>Closed</b></li> <li>Proposer to draft a version 2 of this Modification for Meeting 108 – <b>Closed</b></li> <li>Secretariat to draft a Final Recommendation Report – <b>Closed</b></li> <li>Market Operations to progress request for Impact Assessment - <b>Open</b></li> </ul>
<p>Mod_15_21 Alter CDIFF Section F.18.7.2</p>	<ul style="list-style-type: none"> <li>Secretariat to issue a Withdrawal Notification - <b>Closed</b></li> </ul>
<p>Mod_20_21 Undo Instruction Scenario 2</p>	<ul style="list-style-type: none"> <li>Proposer to review an option to produce remedial out of market system invoices based on MO materiality assessments – <b>Open</b></li> <li>Proposer to provide more detail on how Generators were over paid - <b>Open</b></li> </ul>

**2. URGENT MODIFICATION PROPOSAL**

**MOD\_04\_22 ALTERNATIVES TO LIBOR**

The Proposer delivered the Modification Proposal noting that LIBOR had ceased, and SEMO were offering two alternative rates, SONIA for Sterling and Ester for Euro. It was advised these would be the better replacements as advised by the treasury advisor; other alternative rates were explored but they were not available with the same frequency as LIBOR or they would not change as dynamically as the ones proposed. The Proposer went through the legal drafting noting that SEMO would require an overnight rate.

It was advised that this Modification was submitted as Urgent due to the latest LIBOR rate being used since the 31<sup>st</sup> December and not being update since. The use of more relevant rates would be needed going forward.

A Generator Member asked how quickly this would be implemented and assurance was given by the Proposer that as it was a straightforward process amendment it would be actioned quickly as soon as approved by the SEMC, as no system changes are required.

A Supplier Member questioned the LIBOR static rate at present, the differential between SONIA, Ester and LIBOR and if Participants should expect a steep change in their Settlement Documents. The proposer explained that with LIBOR static since the 31<sup>st</sup> of December, there were minor differences with the SONIA rates of approximately 3%, while the Ester rate was still very similar. It was expected that Participant could notice some changes at first due to the rate applied so far not having been updated since the 31<sup>st</sup> December but those difference would smooth out once more accurate rates are used going forward. There was a request for more clarity in the language used in Section 2.6.1 of the Modification around the use of SONIA for sterling and Ester for Euro. The Proposer agreed that this could be taken away and re-worded for the FRR.

MO Member added that there would be similar changes for the Capacity Market Code but with LIBOR only used for default in Capacity, the change would not be as urgent as for the Balancing Market.

**Decision**

This Proposal was Recommended for Approval subject to minor legal drafting to be captured in FRR.

Recommended for Approval by Unanimous Vote		
Andrew Burke	Renewable Generator Member	Approve
David Gascon	Generator Alternate	Approve
Robert McCarthy	DSU Member	Approve
David Caldwell	Supplier Alternate	Approve
Ian Mullins	Supplier Alternate	Approve
Sean McParland	Generator Alternate	Approve
Paraic Higgins (Chair)	Generator Member	Approve
Nick Heyward	Flexible Participant Alternate	Approve
Rochelle Broderick	Supplier Member	Approve
Brigid Reilly	Supplier Alternate	Approve
Bryan Hennessy	Supplier Member	Approve
Patrick Larkin	Assetless Alternate	Approve
Stacy Feldmann	Generator Member	Approve

**Actions:**

- Secretariat to draft a Final Recommendation Report – **Open**
- Proposer to update legal drafting for the FRR in Section 2.6.1 to provide more clarity around the Resettlement rates SONIA for sterling and Ester for Euro – **Open**

**3. DEFERRED MODIFICATION PROPOSALS****MOD\_20\_21 UNDO INSTRUCTION SCENARIO 2**

The Proposer delivered a [presentation](#) on this Modification noting that the slides focused on overpayment examples as requested by Members at meeting 108. The presentation explained overpayments occur as a result of impact and magnitude of error and prices or when issues are protracted for a long time. It was advised that there had been a change in the way the two Modifications were approached, and this was because SEMO had further engagements with the vendor and there was more comfort that the changes will not be as risky. In addition to that an increase in the number of instances verified has made the change to the system more cost effective as there were 19 occurrences in 2021 alone and the materiality of all the issues had increased to 1.7M in underpayments and 450K approximately of overpayments. This made the second action requested at meeting 108 (investigating solution for invoicing out of system) less appropriate and as such it had not progressed pending the result of the detailed impact assessment.

With regards to Mod\_20\_21 the Proposer believed that a system change was not required because no event had been identified so far and even if an occurrence were to be identified it would be time limited therefore likely not material. It was suggested that the best course of action for Mod\_20\_21 would be to address the non-compliance through changes to the T&SC to match the system and even if this would not be the course of action normally recommended, it would be the most appropriate in this case for practical reasons and to avoid unnecessary costs.

For the remaining scenarios the advice was to progress the detailed impact assessment, verify whether scenario 4 could be covered under scenario 1 and proceed with prioritizing the implementation of changes for scenario 3 which was the one occurring most frequently and with the highest materiality.

A DSU Member provided a recap on the Modification Proposal noting that for Mod\_20\_21 there were no examples of overpayment or underpayment so the Modification would be advanced for compliance purposes and a more detailed Impact Assessment would be required before being able to take a vote on Mod\_21\_21.

A Supplier Member questioned why instances were going up between 2020 and 2021. MO Observer advised that they had been tracking these occurrences better and more instances of small materiality had been found as opposed to previous years where only the larger ones would be picked up.

The Proposer concluded the presentation by going through how to identify these issues and advised Participants to always raise Settlement queries going forward because these instances were no longer treated as defects and needed to be raised as formal queries for SEMO to fix them. The Proposer also advised that so far there had been a lot of focus on the TSO dispatching outside TODS as a potential cause for these events, while the analysis seem to show that often these cases are due to units not updating their TODS appropriately. The presentation showed an example where PNs and MG were matching closely while the DQs derived by the Technical Data would be significantly different. The problem would not have occurred were the TODs updated to match the unit actual capability. A reminder to Participant to make sure that all data submitted would be accurate to avoid the recurrence of such issues.



**Decision**

This Proposal was Recommended for Approval.

Recommended for Approval by Unanimous Vote		
Andrew Burke	Renewable Generator Member	Approve
David Gascon	Generator Alternate	Approve
Robert McCarthy	DSU Member	Approve
David Caldwell	Supplier Alternate	Approve
Ian Mullins	Supplier Alternate	Approve
Sean McParland	Generator Alternate	Approve
Paraic Higgins (Chair)	Generator Member	Approve
Nick Heyward	Flexible Participant Alternate	Approve
Rochelle Broderick	Supplier Member	Approve
Brigid Reilly	Supplier Alternate	Approve
Bryan Hennessy	Supplier Member	Approve
Patrick Larkin	Assetless Alternate	Approve
Stacy Feldmann	Generator Member	Approve

**Actions:**

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

**MOD\_21\_21 UNDO INSTRUCTION SCENARIO 4**

The Proposer discussed this Modification in line with Mod\_20\_21 as detailed above. It was noted that this Modification would require a more detailed Impact Assessment and therefore it was agreed it would be deferred.

**Decision**

This Proposal was deferred pending detailed Impact Assessment.

**4. NEW MODIFICATION PROPOSALS**

**MOD\_01\_22 BALANCE SURETY\_DEMAND GUARANTEE**

The Proposer delivered a [presentation](#) on the Modification Proposal noting that this Modification proposes a new form of collateral called Surety or Demand Guarantee issued by insurance institutions. This alternative would be the same as a Letter of Credit that is currently issued by a wide range of banking institutions. The Proposer advised that this was already being used extensively with the Revenue Commissioners for example. It was noted that typical guarantors included household names such as Chubb, Aviva and AIG.

The Proposer went through the benefits of this alternative noting that it would bring more choice to the market and it could be more cost effective to Market Participants than a Letter of Credit. Assurance was given that credit ratings of insurance institutions could be as good as any bank, and the liquidity provided was the same as a Letter of Credit.

It was noted that there would be significant drafting changes as this Modification would broaden the definition of a provider which is referenced in many paragraphs of the Code, Appendices and Agreed Procedures. The Proposer went through additional minor amendments from a late legal review and gave thanks to SEMO for their input.

There were some questions and concerns raised from both Generator and Supplier Members that Demand Guarantee may not be able to provide the same liquidity as Letter of Credit and if some of these guarantors may be risky. MO Observer replied that the criteria for Letter of Credit and Demand Guarantee would be the same with the ability to repay within that same day transfer as a definite requirement. It was also noted that among other requirements, guarantors would need to have a specific minimum Moodies rating and at least 1 billion in their asset sheets.

It was questioned if any of these guarantors had already gone through this assessment. MO Observer advised that they were only requested to verify one such provider, namely Chubb, and they were satisfied that they could address all requirements but could not provide any information on guarantors that had not gone through the process yet. The Proposer provided assurance that Demand Guarantee is widely used in other international Energy Markets at the moment. MO observer also clarified that the list of suitable providers would only be updated as Market Participants request a new provider, but once a provider is included on such list, checks would be carried out on a quarterly basis to confirm that each provider is still able to satisfy each requirement.

It was queried why they had not been used before and if they had simply been overlooked. MO Member clarified that they were definitely discussed for the previous market and suggested that they may have been excluded because they could not provide same day payments requirement that only banks at the time could provide and that their international financial rating following the crash could also have played a part in the exclusion.

**Decision**

This Proposal was Recommended for Approval.

Recommended for Approval by Majority Vote		
Andrew Burke	Renewable Generator Member	Reject
David Gascon	Generator Alternate	Approve

Robert McCarthy	DSU Member	Approve
David Caldwell	Supplier Alternate	Approve
Ian Mullins	Supplier Alternate	Approve
Sean McParland	Generator Alternate	Approve
Paraic Higgins (Chair)	Generator Member	Approve
Nick Heyward	Flexible Participant Alternate	Approve
Rochelle Broderick	Supplier Member	Approve
Brigid Reilly	Supplier Alternate	Approve
Bryan Hennessy	Supplier Member	Approve
Patrick Larkin	Assetless Alternate	Approve
Stacy Feldmann	Generator Member	Approve

**Actions:**

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

**MOD\_02\_22 COST RECOVERY WHEN UNDER TEST**

The Proposer delivered a presentation on this Modification Proposal noting that currently energy prices are becoming more volatile and as high levels of SNSP are achieved, BM prices will more frequently go negative. The Proposer went through the slides highlighting that the direction of BM prices and operating costs this poses a significant burden to the Generating Unit that are not able to recover their costs.

The Proposer advised that this Modification Proposal would focus on a change in settlement rather than a change upstream to the data submission for pricing. It was noted that when a unit is under test, the proposal allows the PNs to be set at zero (or the maximum of zero and its ex-ante quantity should the unit have trades in day ahead auctions) and this will allow for costs to be recovered.

A DSU Member raised a question around the mechanics of solution in settlement and if Generators are required to put in under test PN this may have no relation to costs to recover. The Proposer noted that under the current mechanism with no change upstream in the submission of data, PNs would be overwritten in the settlement systems and the unit inc'ed up allowing recovery of costs.

A Supplier Member acknowledged the risk on Generators but voiced concern for the wider impacts of this modification. It was also questioned if there could be recovery over and above operating costs. The Proposer noted that that over-recovery was not a new possibility introduced by the Modification proposed and already existed, the Modification only focused on preventing under-recovery.

Further concerns were raised by a SO Member that this Modification could increase Imperfections and if approved all risk associated with testing which are only controllable by the generators, gets just passed on to the consumer. It was also queried how such a change to the Code was not going to change imperfections or tariffs as suggested in the last slide of the presentation. The Proposer indicated that no changes were

proposed to those processes and acknowledged the concerns raised but noted that they couldn't see any other solution to try to avoid far reaching changes to data submission which would be more complicated to implement SO Member also highlighted that a testing cost when occurring, is either recovered under testing tariffs or via imperfections. SO Observer also questioned some of the supporting data provided by the proposer that didn't provide the full accurate picture of the revenue stream and of the actual events that took place in the event singled out in the presentation.

A Renewable Generator Member advised that the risk here was best placed with those that could manage it. It was noted that if one trades at the wrong price, there will be a consequence and this risk goes to the Generator and trading organization behind the Generator which is the correct principle.

SO Observer advised that in terms of the impact of changes to testing, it would have to be considered in context to outcomes not just from the Balancing Market, but also in Operations, DS3 System Services, Capacity Market, Imperfections and Testing Tariffs. The benefits of completing testing and coming back from outage are not just limited to the SOs management of the security of supply, but the unit itself has an interest because all relevant revenue streams are only realized when the unit becomes fully available again. Therefore, taking these costs in isolation is not appropriate. On an operational level there is also the cost and limitation of commissioning resources on site, which form part of the unit decision for when to complete testing. It was noted that these additional considerations were not considered in the proposal. SO Observer also raised a concern that the settlement periods singled out in the presentation were slightly biased to show only those early trading periods where large costs were lumped on; if other periods had been taken into consideration, the picture would be quite different. In terms of volatility there was agreement that the last 2 years volatility increased, but far from resulting in an increase of negative prices, the direction was actually positive and the Balancing Market prices have been steadily increasing rather than decreasing and so are the instances of positive prices vs negative ones in contradiction with what was mentioned in the proposer slides.

The Proposer agreed that the statement needed revision, but the intent was to highlight that the differential between the BM prices and the unit's costs are getting lower.

SO Observer also referred to the last slide and noted that the statements given could not happen at the same time. It was advised that this Modification would either increase imperfection costs or testing tariffs, and if it were to be imperfections, then this would be an additional cost put on the consumer. In many cases significant testing is called by the Generators not the TSO (as it was for the example presented) and it is managed at unit level, therefore the risk should be borne by them.

The Proposer felt that that this proposal would get units back on the market as quickly as possible and that was in everyone's interest. SO Member questioned the fact that the unit should be brought back from outages at all costs and in fact in the instance referred by the Proposer in the presentation, the TSO would not have wished the unit back in the circumstances that were realized: overnight with very high wind.

The Chair summarized that there was a lot of feedback from both sides but that this Modification covered a lot of other aspects of the Code and it could be seen how future increase in wind penetration could indeed cause issues of under-recovery. The Proposer requested more time to discuss this Modification before the next meeting and Secretariat advised that an Industry Call could be convened quite quickly with assistance provided by Secretariat. SO Member noted that there were some areas outside T&SC that would be affected, and it would be beneficial for Members to reach out to other Participants in industry.

## **Decision**

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This Proposal was deferred.

## **Actions:**

- Members to provide details of suggested attendees to the Secretariat for inclusion in the Industry Call - **Open**
- Secretariat to liaise with Proposer to convene an Industry Call to further discuss this Modification – **Open**

### MOD\_03\_22 COLLECTION OF MONIES V2.0

The Proposer delivered a [presentation](#) on this Modification Proposal noting that this would apply in case an overpayment to Participants had been identified by the Market Monitoring Unit (MMU) of the Regulatory Authorities (RAs) and there was an agreement with the Participant affected that this money would be repaid. It was advised that this Modification aims to introduce a mechanism to pay these funds back which is outside the Market Systems and the entire procedure is dependent on agreement between RAs and Market Participant.

The Proposer went through the process for highlighting that a form for collection of monies would need to be completed, this would then be sent from the RAs to the Market Operator and following this a Manual Settlement Document would be released to the affected Participant.

The legal drafting outlines that the form would only be submitted when the amount was agreed to be repaid, and any unpaid amount would not be considered a shortfall.

A Supplier Member queried that value or order of magnitude of this repayment. The Proposer could not provide exact details but noted that in the case observed to date, it was substantial.. The Proposer gave assurance that this was not a retrospective change as the mechanism only applies for going forward, however it would be inevitable that the investigations from MMU would look back in time to assess compliance issues. A Generator Alternate requested more clarity on whether any former retrospective payment could trigger a re-settlement. Assurance was given that this mechanism would only be used from this point to repay monies that were over-paid due to submission of incorrect data. A Generator Member asked if the process of investigation could result in either an over or under-payment and why should only one be corrected and not the other. The Proposer explained that It would not apply to under-payments as it is not intended as a replacement for Resettlement. It is to catch those instances where errors in data submissions are not subject to formal queries and where an error had a detrimental impact of the Market. The monies repaid would be going back to the Market via Imperfections.

A question was raised on why the legal drafting used the generic term of 'data' when the proposal seems directed specifically to issues in relation to CODs. The Proposer explained that this is to future proof the Modification for other types of breach scenarios.

A Generator Member gave support to this Modification but asked if there was a subsequent resettlement would there be any potential for that to affect the imbalance price changing or the amount due back and if there would be potential flow issues. A discussion ensued around this point and it was noted that there would potentially be extra work for SEMO to reflect the monies back on resettlement. MO Member clarified that this is a manual mechanism therefore such amounts would not be processed by the systems and could not be captured in Resettlements. The RA Member suggested that the form of submission could be submitted after M+13 allowing the value to be recovered only after M+13.

### Decision

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This Proposal was Recommended for Approval subject to minor legal drafting to be captured in FRR.

Recommended for Approval by Majority Vote		
Andrew Burke	Renewable Generator Member	Approve
David Gascon	Generator Alternate	Approve
Robert McCarthy	DSU Member	Approve
David Caldwell	Supplier Alternate	Reject
Ian Mullins	Supplier Alternate	Approve
Sean McParland	Generator Alternate	Approve
Paraic Higgins (Chair)	Generator Member	Approve
Nick Heyward	Flexible Participant Alternate	Approve
Rochelle Broderick	Supplier Member	Approve
Brigid Reilly	Supplier Alternate	Approve
Bryan Hennessy	Supplier Member	Approve
Patrick Larkin	Assetless Alternate	Approve
Stacy Feldmann	Generator Member	Approve

**Actions:**

- Secretariat to draft a Final Recommendation Report – **Open**
- Proposer to amend legal drafting to note that the form for recovery of monies will be issued after M+13 - **Open**

**4. AOB/UPCOMING MODIFICATIONS**

Secretariat thanked all for attending Meeting 109 and noted the Meeting 110 would take place on Thursday, 7<sup>th</sup> April 2022.

<b>APPENDIX 1 – PROGRAMME OF WORK AS DISCUSSED AT MEETING 109</b>		
<b>Status as at 10 February 2022</b>		
<b>Modification Proposals ‘Recommended for Approval’ without System impacts</b>		
<b>Title</b>	<b>Sections Modified</b>	<b>Sent</b>
Mod_14_21 Extension of System Service Flag to include units providing Replacement Reserve in line with the detailed design	N.2	Sent for RA Decision 19/01/22
Mod_01_20 PMEA No Energy Action Same Direction as NIV	E.3.4.2	Sent for RA Decision 26/03/21
<b>Modification Proposals ‘Recommended for Approval’ with System impacts</b>		
Mod_13_19 Payment for Energy Consumption in SEM for non-energy Services Dispatch	F	Sent for RA Decision 26/03/21
<b>Modification Proposals ‘Recommended for Rejection’</b>		
N/A	N/A	N/A
<b>RA Decision ‘Further Work Required’</b>		
N/A	N/A	N/A
<b>RA Decision Approved Modifications with System Impacts</b>		
<b>Title</b>	<b>Sections Modified</b>	<b>Effective Date</b>
Mod_19_21 Modification re Publication of Information by SEMO	B.13	9 <sup>th</sup> February 2022
<b>RA Decision Approved Modifications with no System Impacts</b>		
<b>Title</b>	<b>Sections Modified</b>	<b>Effective Date</b>
Mod_02_21 Setting a flag for Interconnector Actions above 500/Mwh	Appendix 2, F.2	Effective following delivery of required changes
<b>RA Decision Rejected</b>		
Mod_01_21 Removal of Difference Charges where operational constraints are binding	Appendices Part B	13 August 2021
<b>RA Direction</b>		
Mod_08_20 Imbalance prices to reflect the real-time value of energy	D.4.4.12	Decision letter received – 29/10/20
<b>AP Notifications</b>		
N/A	N/A	N/A
<b>Withdrawal Notifications</b>		
Mod_15_21 Alter CDIFF Section F.18.7.2	F	16 <sup>th</sup> December 2021
<b>Modification Proposal Extensions</b>		

N/A	N/A	N/A
<ul style="list-style-type: none"><li>• <b>Meeting 110 – 7 April 2022 – Conference Call</b></li></ul>		