Consultation Report

Balancing Market Principles Statement

12th August 2025

EirGrid SONI

Introduction

The objective of the BMPS and associated documents is to provide a clear and comprehensible description of the scheduling and dispatch process. This consultation report has been prepared for the Regulatory Authorities following consultation with industry on revisions to the Balancing Market Principles Statement (BMPS).

We published Version 1.0 of the BMPS in September 2017 following a consultation on the format, style and content of the document. Version 2.0 was published in April 2018 following a consultation on revisions which reflected further development of the revised SEM arrangements and relevant developments external to the I-SEM project. Version 3.0 was published in June 2019; Version 4.0 was published in October 2020. Version 5.0 was published in April 2021. Version 6 was published on the 29th of July 2022. Version 7 was published on the 27th of June 2023 following consultation on revisions. Version 8 was published on the 29th of July 2024 following consultation on revisions.

On the 13th of May 2025 we published, for consultation, Version 8.1 of the BMPS which included numerous proposed revisions. The consultation closed on the 12th of June 2025. We received representations from five respondents namely FERA, iPower Flexible Energy, ESB Generation and Trading, Bord Gais Energy and Energia.

This consultation report sets out a summary of the consultation representations we received. We have sought to address representations at an aggregated level in this document and, where appropriate, in the updated BMPS – Version 9.0.

The evolution of the BMPS is set out in the appendix below.

Scope of Revisions

As per Condition 10B and 22B of EirGrid and SONI's Transmission System Operator Licences respectively we are required to ensure that the BMPS is accurate and up to date, to propose revisions as necessary and to consult market participants on the changes. The more significant revisions in the document are tabulated below. Table 1 lists the revisions which were proposed in the consultation.

Table 1: Summary of proposed revisions in BMPS version 8.1.

Section	Update /Revision/ Reason for revision
Important information	SONI Grid Code updated to Version 10, 24th April 2024
	SONI TSO Licence Condition updated to 19th June 2025
	Trade and Settlement Code Part B updated to Trade and Settlement Code to Version 30.0 on 8th November 2024.
	EirGrid Grid Code updated to version 14.3, 25th March 2025
Terms and Definitions	GB-TSO definition updated
	Energy Storage Power Station (ESPS) added
	Non-Priority Dispatch Renewables (NPDR) added
	Regional Coordination Centres (RCC) corrected
	Risk Preparedness Plan (RPP) added
2. Obligations	Update to Figure 2: Scheduling and Dispatch Process Obligations
2.1 **Ensuring Operational Security**	The footnote "In NI, some of these duties are shared with NIE Networks, the Transmission Asset Owner, while maintenance of the transmission network in NI is fully the responsibility of NIE Networks" is revised to read as follows for clarity: "In Ireland and Northern Ireland, Transmission Asset Owners (TAOs) are separate legal entities to the TSOs. Under the respective, certified arrangements, the TAOs have a role in carrying out some of these functions, for example physical maintenance works."
2.2 Maximizing priority dispatch	The footnote "For power-generating facilities commissioned as from 1 January 2026, priority dispatch shall apply only to power-generating facilities that use renewable energy sources and have an installed electricity capacity of less than 200 kW (pursuant to Article 12(5) of the Internal Electricity Market Regulation)" is added for clarity.
	The statement "with the latest SEM proposed decision papers, SEM-21-027, SEM-21-026 and decision paper SEM-22-009, outlining that the treatment and participation of such units is unlikely to change

	markedly until any associated central market system changes are complete" is deleted for clarity.
	The footnote "This legislation was transposed in NI in 2015; however, any successor legislation will not automatically apply in NI", is added to provide more context.
	The second last paragraph is revised by deleting "as amended, including by virtue of The Electricity (Priority Dispatch) Regulations (Northern Ireland) 2020." as the regulations simply added the article to the 1992 order. A further footnote is provided.
2.3 Efficient operational security	The paragraph, "Under the Trade and Cooperation Agreement - Article 311 (1), to ensure efficient use of interconnectors and reducing barriers to trade between SEM and GB, EirGrid and SONI are required to ensure that the maximum level of capacity of electricity interconnectors is made available, respecting the need to ensure (b)(i) secure system operation; and (b)(ii) most efficient use of systems. Also, under Article 311(1)(c), EirGrid and SONI are to ensure the electricity interconnector capacity is only curtailed in emergency situations and this curtailment must take place in a non-discriminatory manner" is revised to read as follows for clarity: "Article 311 (1) of the Trade and Cooperation Agreement between the EU and the United Kingdom (UK) aims to ensure the efficient use of electricity interconnectors and reducing barriers to trade between the EU and the UK. Article 311(1)(b) requires the EU and the UK to ensure that the maximum level of capacity of electricity interconnectors is made available, respecting the need to ensure secure system operation, and the most efficient use of systems. Also, under Article 311(1)(c), the EU and the United Kingdom are to ensure the electricity interconnector capacity is only curtailed in emergency situations and this curtailment must take place in a non-discriminatory manner."
	The sentence in the last paragraph, "The practical application of EBGL in the SEM is suspended pending reconnection of the SEM to the EU internal energy market with the completion of the proposed Celtic Interconnector" is revised and replaced with: "SONI and EirGrid are working to deliver these obligations via a number of workstreams, including those required to ensure that we are prepared for the reconnection of the SEM to the EU internal energy market with the completion of the proposed Celtic Interconnector." This update reflects the volume of work currently ongoing in this area.
3.1.1 **Priority Dispatch**	Reference to the footnote regarding priority dispatch controllability is updated in footnote 8.

3.1.2 **Scheduling and Dispatch Policy Parameters**	The second last paragraph is updated with the latest SEMC decisions. The period that these parameters apply to is also highlighted.
3.2.1 **Unit Technical data** **(and throughout the document)**	TSC Part B is replaced with simply TSC to reflect the current situation.
3.2.4 **Availability and Systems Services Capability Declarations**	The second paragraph is edited to reference the correct TSC sections.
	The paragraph, "In preparation of the go-live of the Scheduling and Dispatch Programme (SDP), the TSOs are developing operational procedures to guide the declaration of availability for battery units. Some of these are captured in the Overview of Scheduling and Dispatch Programme (SDP) Solution for Battery Units. These rules will provide a structured approach by which battery units will declare availability Real time availability signals will be transmitted to the TSOs via EMS." is added to provide high level detail on the treatment of batteries post SDP-go-live.
3.4.2 Renewable Forecast	The paragraph Note that while wind participants may submit physical notifications (PN) representing their forecast production, these are not used in the scheduling and dispatch process. Rather we develop schedules that utilise our own forecast of renewables. This approach is driven by the priority dispatch categorisation of renewable generation is revised as follows for clarity: "Note that while wind and solar participants with priority dispatch status may submit physical notifications (PN) representing their forecast production, these are not used in the scheduling and dispatch process. Rather we develop schedules that utilise our own forecast of dispatchable priority dispatch renewables. This approach is driven by the priority dispatch categorisation of renewable generation"
	The sentence "The impact of solar micro generation is having a material impact on demand profiles and more generally on the scheduling and dispatch process. The forecasting and treatment of this embedded generation is in development" is deleted and replaced with "The forecasting of embedded generation, with respect to the scheduling and dispatch process, is under development" for clarity.
3.4.3 Constraints	Figure 5 is revised by removing the South-West Must Run, which no longer applies
	The sentence "Constraints may also arise on distribution network connected units. Where such constraints impact on our ability to

	dispatch/control units, the relevant DSO/DNO will inform us so that the constraint is reflected in the scheduling and dispatch process" is moved.
	Four (4) new paragraphs are introduced at the end of the section to describe (1) the TSO/DSO operational model and (2) its upcoming implementation between SONI and NIEN.
4 The Scheduling and Dispatch Process	The paragraph about the Scheduling & Dispatch Programme is in this section is revised for clarity.
	The sentence "The SDP will be delivered in two tranches. Tranche 1 will address the treatment of NPDR, Battery Energy Power Stations (ESPS), and wind and solar dispatch improvements. Tranche 2 will address low carbon inertia services capability, fast frequency response capability, and reserve services capability dispatch and scheduling from new providers" is revised and replaced with "The SDP is still ongoing, and the changes introduced as part of the program are outlined to the maximum extent possible in this document". This better reflects the imminent nature of this transition.
4.2 **Input Data Processing**	The sentence "Note: Battery ESPS units are an initiative of the 'Scheduling and Dispatch Programme' with the aim to produce a solution for Battery ESPS units that will increase their use in scheduling and dispatch" is deleted as it is already captured in the prevailing SDP text in the document. It is provided as footnote 16 in the new text.
	The text, "Note: The scope of the 'Scheduling and Dispatch Programme' includes the improvement of the treatment of Synchronous condenser units in the central market systems" at the end of section 4.2 is moved down as a footnote.
4.4.5 **Battery Energy Storage Power Stations (ESPS) units**	A summary of the treatment of batteries on SDP go-live is added as follows: "Following go-live of the Scheduling and Dispatch Programme batteries will be included in indicative operational schedules by scheduling to their PN and enhancing the dispatch capability to allow for scheduling and dispatch to positive and negative quantities. Due to the scheduling systems' inability to optimise batteries with respect to energy limits, the Scheduling and Dispatch Programme changes will enable the dispatching of batteries to PN as far as is reasonably possible, rather than dispatching based on merit alone. Scheduling applications will include battery units in reserve scheduling, allowing each battery unit to contribute to any reserve category based on the reserve capability curves data, state of charge and real time availability of the units".

4.5 **Meeting Our Obligations**	The link to the LNAF and SIFF documentation is updated with the most recent one (SEM-24-054a).
4.5.3.1 **Process Design**	The sentence As Participants can update their costs and PNs up to one hour ahead of real-time, our schedules are updated on a more regular basis to ensure that we are also operating off the latest commercial positions is updated by replacing "up to one hour ahead of real-time" with up to the Gate Closure of the Imbalance Settlement Period" for clarity.
5.2.1 **Overview**	The following text is added to the reporting mechanism section as relates to the Non-Market generation: "A System Margin Warning may also be issued in Ireland when SONI has issued an Alert state, EirGrid has maximised market-based support over the N-S Tie-Line, the Tie-Line has additional transfer capacity, and SONI and has invoked Emergency Assistance on the Moyle Interconnector. A "Margin Shortfall Risk" notice will be issued to the market indicating when the Moneypoint units are dispatched indicating the period ahead for which there is a heightened risk of a system Alert or Emergency state in the absence of non-market units in the margin calculation. Dispatch of Moneypoint and TEG units in response to tight margins will appear in Balancing Market reports (See Section 5.2.2.2). A list of Margin Warnings, Margin Shortfall Risk notices, and dispatch periods of these units will be reported in the Annual All-Island Transmission System Performance Report."
5.2.2.1 **Background**	Updated information relating to dispatch of TEGs is provided as follows: "These units can be dispatched in real-time. The conditions under which these might be considered in margin calculations and dispatched are outlined in this section. From 1st July 2025 additional non-market generation, provided by Moneypoint units 1, 2, and 3 will be available to the System Operator. These units will generally not be available at short notice. The decision criteria for calling on these units are addressed in section 5.2.3. Article 11(1)(g) of Regulation (EU) 2019/941 requires the treatment of non-market measures to be addressed in the respective Risk Preparedness Plans for Ireland and Northern Ireland. These plans are currently being updated by the CRU (as the competent authority for Ireland) and the DfE (Northern Ireland). As the Regulation specifies the publication of the final updated plan by January 2026, the information below relates to the treatment of non-market generation at the time of publishing the BMPS"
5.2.2.3 **System Operations Treatment**	This section is revised and split based on jurisdictions (Ireland and Northern Ireland). The section is updated to describe how TEG in Ireland may be used to support NI.

	The note "Any market revenues received by a TEG through the BM is in turn paid to EirGrid to the benefit of use of system customers" is deleted as it is out of scope of the BMPS.
5.2.2.4 **Reporting and transparency**	A new section on Reporting and transparency is provided.
5.2.3 Retained Existing Units (Moneypoint)	This section is added with comprehensive details relating to Moneypoint retained units, their market treatment, their treatment under system ops, and the associated principles for decision making.
5.2.4 Summary of Moneypoint and TEG activation	This section is added to distinguish the technical and operational characteristics of TEGs from those of the retained Moneypoint units.
Appendix 1.2 **Operational Security Obligation Framework**	The row in the table relating to European Legislation is edited by adding Commission Regulation (EU) 2019/941 on risk-preparedness in the electricity sector.
	The section with National Legislation is revised by adding two references (a) EirGrid, Electricity and Turf (Amendment) Act 2022 (S.I. No 17/2022), (b) Electricity Crises: A Risk Preparedness Plan for Ireland (Revised Decision Paper: CRU202346)
	A row listing relevant regulatory decisions in Ireland is added (a) "Security of Electricity Supply – Retention of Moneypoint Units (MP1, MP2 & MP3)", CRU Information Paper dated 17/10/2023 (b) "Electricity Security of Supply Programme of Work Update April 2024", CRU Information Note.
	The table is updated by moving the row on Regulatory Decisions to the end of the Table. This applied across all the tables with Regulatory Decision rows, for conformity. This is further updated to include, where needed, the Risk Preparedness Plan.
Appendix 1.4 **Efficient operation of SEM Obligations Framework**	An additional European legislation is added to the list: Commission Regulation (EU) 2017/2195 establishing a guideline on electricity balancing (EBGL).
Appendix 2.1 **Input Data Processing**	The table under "Participant / Service Provider Technical and Availability Data" is updated to include the treatment of solar"

After completion of the consultation process with industry SONI and EirGrid determined that it was not necessary to make any additional changes to those outlined in Table 1 above.

Industry Representations

This section summarises the representations we received during the consultation. Table 2 provides a summary of the representations received during the external BMPS consultation that are within the scope of the BMPS consultation. Table 2 also outlines the responses to the representation received.

Table 2: Summary of comments from market participants

Section / Topic	Summary of Representation(s) Received	TSO Response
Scheduling and Dispatch Program, SDP (ESPS)	Energia and BGE raised issue with the treatment of battery units. BGE disagreed with the prospects that batteries will have to declare availability in EDIL "when they deviate from PNs" while Energia requested for greater detail on the dispatching of batteries to PNs,	The TSO notes that the BMPS is meant to provide a high-level description of the scheduling and dispatch process. To this end the phrase pointing to deviation from PNs is deleted for clarity and reference to the relevant document on the SDP solution for Batteries post go-live provided here.
	Energia raised concern about the inclusion of batteries in the current BMPS document and described these as not being imminent to warrant their inclusion.	The respondent's concerns were noted. However, the content on batteries was retained (except the deletion in the above section) as the relevant T&SC mode and IT system implementation is expected in this calendar year.
Scheduling and Dispatch Program, SDP (NPDR – Across section 3.2 and 4.4)	BGE and ESB GT raised issues with the proposed treatment of NPDRs. BGE disagreed with the wording around the submission of NPDR forecast availability through the BMI. They requested that this change should be discarded. ESB GT, on the other hand suggested that there is need for more industry engagement around Mod_13_23 on the treatment of NPDR, which remains unapproved.	Considering the status of the Mod_13_23 on NPDR, and the current delay in the delivery timelines, the BMPS has been revised to remove NPDR-related content throughout the document.

Section / Topic	Summary of Representation(s) Received	TSO Response
TSO -DSO operating model (Section 3.4.3)	ESB GT requested increased workshops with the industry to enhance their understanding of the TSO DSO model. iPower requested for the revision of the subsequent BMPS documents to include the EirGrid-ESB Networks operation model once available. Energia suggested the removal of future changes that were not imminent, including the TSO-DSO model. Lastly, BGE sought confirmation that "clear reporting will occur of scheduling and dispatch outcomes, where DSO schedules were included in the TSO schedules". This, in their view, is critical for transparency and predictability of the market.	Concerning the request for increased industry engagement, the TSO notes that these will be managed through the relevant projects in SONI & NIE Networks, and between EirGrid & ESB Networks (in this case the Joint System Operator Program, JSOP). The section relating to the TSO-DSO operational model has been retained as the SONI-NIEN piece referenced in the document will be operational within the year and its description is included to ensure that the operational impact is understood by the stakeholders. On this, it is noted that currently, it is not the intention of the TSO to publish information relating to the DSO's congestion management activities. Arrangements for publishing information on these activities may be developed in the future as deemed appropriate. Based on information available on expected DSO congestion management peak requirements it is not expected to be at a scale which would be impactful on the market for Winter 25/26.
Temporary emergency generation, TEGs (Sections 5.2.1 – 5.2.2)	BGE requested the re-inclusion section 5.3.1.3 of version 8 on Market Treatment which had been deleted on the basis that it was out of scope of the BMPS given that it has direct impact on the flagging and tagging imbalance pricing process.	The deleted text is reinstated as it was in version 8.0. For consistency, a new section on market treatment of the Retained Moneypoint units is also added.
Retained Moneypoint units (Section 5.2.3)	ESB GT sought clarification on whether the rules applied to Moneypoint and TEGs are the same. BGE suggested that reasonable notice (>48 hours) should be provided to the market concerning the prospects of Moneypoint being needed in dispatch	The TSO noted that the notice times and ramp times of Moneypoint units differ significantly from the TEG units in that both notice and ramp times are substantially longer. The TEG units can be committed in response to real-time system requirement (in under 15 min) while the Moneypoint units require multiple days to reach full output from a cold warmth state. It is for this reason that a "Margin Shortfall Risk" rather than a real-time "Margin Warning" will be issued when notice is issued to the Moneypoint units. Given this, the rules and scenarios of the use of these resources differ.

Section / Topic	Summary of Representation(s) Received	TSO Response
		For further clarity, a summary comparison has been added as section 5.2.4, and it provides the operational distinction between the TEGs and the Retained Moneypoint units that would warrant application of different rules.

Publication of a Revised BMPS

As per Condition 10B and 22B of EirGrid and SONI's Transmission System Operator Licenses respectively, if necessary, we will update the BMPS following the review of the Consultation Report by the Utility Regulator and the Commission for Regulation of Utilities.

The BMPS is hosted on both EirGrid and SONI websites, as well as the 'TSO Responsibilities' page of www.SEM-O.com. Alongside it, are published operational processes and methodologies which provide more information on specific aspects of scheduling and dispatch. These process and methodology documents are subject to change without consultation.

Appendix: Development and Maintenance of the BMPS

During the I-SEM project the SEM Committee highlighted the need for transparency and predictability of TSO actions in the Balancing Market. The purpose of the BMPS is to provide clarity and certainty to market participants on the timing and nature of TSO actions and to describe how exceptional actions will be reported.

In its 2015 decision on the energy trading arrangements in I-SEM, the SEM Committee (SEMC) supported the development of a Balancing Market Principles Statement (BMPS) by the TSOs to ensure consistency, transparency and comprehensibility of TSO decision making in the Balancing Market. Following an initial consultation with the I-SEM market rules working group, the SEMC consulted publicly on the Terms of Reference for the BMPS before publishing the approved terms in October 2016.

In December 2016, both Regulatory Authorities consulted on modifications to SONI and EirGrid's TSO Licences to incorporate a requirement on both TSOs (in conjunction) to develop and maintain the BMPS in line with the Terms of Reference determined by the SEMC. The decision on the modifications was published in March 2017.

Table 3: Key milestones in the development and maintenance of the Balancing Market Principles Statement.

Document	Reference / Date
SEM Committee Decision on Energy Trading Arrangements, Detailed Design	SEM-15-065, 11th September 2015
SEM Committee Decision on Balancing Market Principles Statement Terms of Reference	SEM-16-058, 7th October 2016
Revised SONI Transmission System Operator Licence	Condition 22B, March 2017
Revised EirGrid Transmission System Operator Licence	Condition 10B, March 2017
BMPS First Consultation Version	7th April 2017
BMPS First Consultation Responses	8th September 2017
BMPS First Approved Version 1.0	8th September 2017
BMPS Revised Version 1.1 for Consultation	6th March 2018
BMPS Approved Version 2.0	11th April 2018
BMPS Revised Version 2.1 for Consultation	10th January 2019
BMPS Approved Version 3.0	14th June 2019

Document	Reference / Date
BMPS Revised Version 3.1 for Consultation	23rd July 2020
BMPS Approved Version 4.0	14th October 2020
BMPS Revised Version 4.1 for Consultation	26th February 2021
BMPS Approved Version 5.0	28th April 2021
BMPS Revised Version 5.1 for Consultation	12th April 2022
BMPS Approved Version 6.0	29th July 2022
BMPS Revised Version 6.1 for Consultation	24th April 2023
BMPS Approved Version 7.0	27th June 2023
BMPS Revised Version 7.1 for Consultation	20th of May 2024
BMPS Approved Version 8.0	29th of July 2024
BMPS Revised Version 8.1 for Consultation	13th of May 2025
BMPS Approved Version 9.0	12th of August 2025

The obligations of Condition 22B and 10B of our licences require us to ensure the BMPS is as accurate as possible. The BMPS will be reviewed on an ongoing basis and any revisions that are required will be consulted on with market participants. We must also engage with the Regulatory Authorities on proposed revisions to the BMPS and submit to them the revised version before publication.