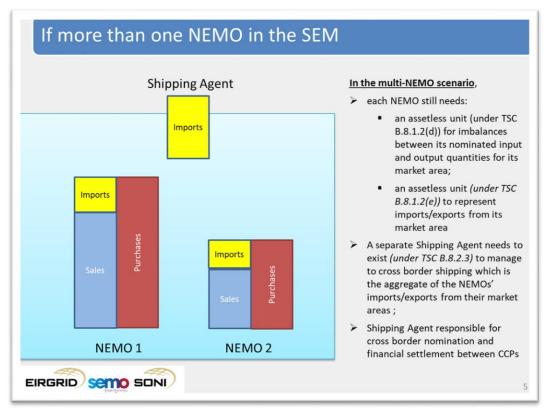
Introduction to Modification for facilitation of MNA for SEM

- When written in 2016, the new Trading & Settlement Code was drafted to fully facilitate multiple NEMOs in the SEM.
- At that time, GB was the only jurisdiction which contained more than one NEMO and applied an approach called the Special Purpose Vehicle, where one Shipping Agent was responsible for cross border nominations on an interconnector.
- > The SEM design followed this model.
- From Rules Working Group presentation...

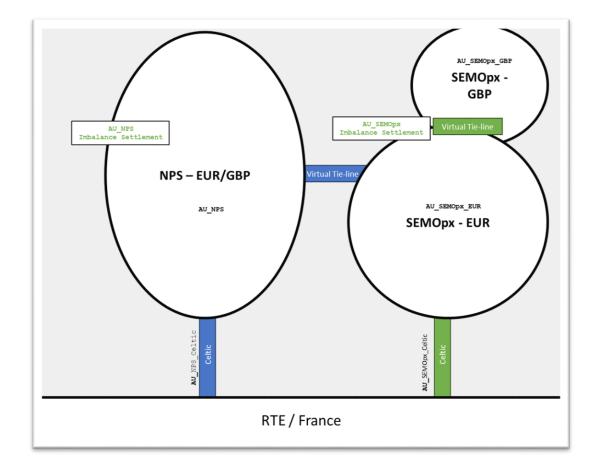


Introduction to Modification for facilitation of MNA for SEM

As multi-NEMO Arrangements were rolled out across the EU after the I-SEM programme went live in 2018, a different approach was adopted.

This is the "preferred shipping agent approach" wherein each NEMO is responsible for their own nominations for

each interconnector.



Introduction to Modification for facilitation of MNA for SEM

- This requires changes to the SEM T&SC, principally around the concept of the Scheduling Agent of the Shipping Agent.
- This no longer applies for an interconnector but for a SEM NEMO for each Interconnector. This just requires the addition of text "for each SEM NEMO" as appropriate.
- > A further change removes text that required SEMO to maintain records of which participant traded through which NEMO.
- This original clause unintentionally created an implicit rule of exclusivity i.e., a participant can only ever trade with one NEMO. This has now been removed.
- Minor changes were also required to the calculation of the imbalance volume for the SEM NEMO's assetless unit as a result.
- Required changes to the Central Market Systems are being progressed through CR-330.
- These changes are needed to ensure that the Trading & Settlement Code and Central Market Systems fully facilitate the requirements of article 4 of the regulation on Capacity Allocation and Congestion Management