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Response to SEMO Consultation

SEMO Market System Development Plan (MSDP) Consultation 2026-2027

Electricity Association of Ireland

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A decarbonised future powered by electricity.

Electricity Association of Ireland

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The Electricity Association of Ireland (EAI) is the representative body for the electricity industry and gas retail sector operating within the Single Electricity Market (SEM) on the island of Ireland.

Our membership comprises utilities that represent 90% of generation and retail business activities and 100% of distribution within the market. Our members range in size from single plant operators and independent suppliers to international power utilities. Our members have a significant presence in Ireland, Northern Ireland and Great Britain across the sector value chain. We represent the interests of the all-island market in all relevant jurisdictions, including the EU via our membership of the European electricity representative body Eurelectric.

We believe that electricity has a fundamental role in providing energy services in a decarbonised, sustainable future, in particular through the progressive electrification of transport and heating. We believe that this can be achieved, in the overall interest of society, through competitive markets that foster investment and innovation.

We promote this vision through constructive engagement with key policy, regulatory, technology and academic stakeholders both at domestic and EU levels.

Our ambition is to contribute to the realisation of a net-zero GHG emissions economy by 2050 or sooner, in order to limit the impact of rising temperatures. Electricity offers opportunities to decarbonise the Irish economy in a cost-effective manner.





Introduction

The Electricity Association of Ireland (EAI) welcomes the opportunity to respond to this consultation on the Market System Development Plan (MSDP) for the period 1st January 2026 – 31st December 2027. Our members appreciate the opportunity to review the proposed projects planned for the Market Operator Systems. However, our response highlights several key areas of concern for industry relating to market development scope, project flexibility, and practical timelines for modification implementation.

Concerns Regarding Market Development Scope and Flexibility

We are disappointed to note that the modifications concerning secondary trading in the CRM are not included in the draft MSDP. We believe that these modifications fall within the remit of this consultation, as they are “market facing changes...[that] will facilitate the effective operation, administration, and development of the SEM”.

We note that in the summary of consultation responses for the prior MSDP (24-25), SEMO stated that changes to CRM systems were outside of their remit as it was the SOs that had responsibility for CRM system changes. The MSDP itself needs to be clearer in terms of which systems and markets are in scope, and for those that aren’t, where they are being covered.

Previously, SEMO produced a Roadmap for Market Development with the SOs, which covered MSDP systems as well as areas where the SOs had responsibility, such as the CRM (indeed, there were explicit updates on secondary trading). The final version of the Roadmap was published in December 2020, with the SOs to incorporate their updates into the “Pathways to 2030 Vision document”. However, since the discontinuation of the Roadmap there has been a lack of clear and consistent updates, particularly on the implementation of CRM modifications CMC_11_21 and CMC_09_22 which relate to secondary trading.

In order to provide a complete picture of market system development, EAI recommends that SEMO works with the SOs to bring back the Roadmap for Market Development. This will help





ensure that there are no gaps in the system development updates, and market participants are getting a holistic view of which projects are and are not being prioritised.

A timeframe for, and any relevant contingencies influencing, decisions affecting the implementation of Mod_13_23 (SDP_01 Treatment of Non-Priority Dispatch Renewables) would also be welcome and should be incorporated as part of the Roadmap for Market Development. We note the MSDP currently lacks specific provision for these changes.

Furthermore, looking ahead, we urge SEMO to adopt a high level of flexibility in its market development approach, as this is essential for future-proofing the SEM systems. A more adaptable framework is required to ensure the market can efficiently integrate future changes and emerging technologies.

Modification Timelines and Prioritisation

A key area of concern for our members is the disparity observed in the timelines for modification implementation. There appears to be a pattern where modifications that are primarily TSO-led or RA-led are implemented in a smoother and faster manner compared to modifications that are SEMO-led. Industry requires a more equitable and efficient process to ensure that all necessary system changes, particularly those that are critical for market participants and fall under SEMO's remit, are not unduly postponed. Achieving an effective electricity market relies on the committed and timely delivery of all essential system modifications.

Furthermore, EirGrid should focus on delivery of market system changes that provide the greatest value to consumers and customers. The timeframe for implementation of system changes should also be influenced by the urgency required to deliver such value. In this context, while the Celtic interconnector is due to come online in 2028, there are modifications that should be prioritised ahead of Celtic-coupling driven modifications. For example, we understand that the system changes being addressed pursuant to CR-330 (to facilitate



multiple NEMOs) are needed for when Celtic comes online but that they should not take significant time and in the meantime, the rules and systems are already CACM compliant.

We therefore suggest that the CR-330 implementation should be deprioritised in favour of a backlog of change requests and defects that remain outstanding. For example CR-305 (system action repricing) offers benefits to the market and participants in terms of efficiency as without its implementation, Generator Units that hold reliability obligations will continue to be exposed to Difference Charges at a time where large import volumes are also accompanied by the dispatch down of such Generator Units. CR-305 is an example of a high value system change that should be prioritised over CR-330 and other lower value (to consumers/customers) system changes.

Conclusion

Once again, we welcome the opportunity to respond to this important consultation. We ask that SEMO consider the concerns outlined above in preparation of the final market development plan. If you require any clarification or have questions, please do not hesitate to contact these offices.

Yours sincerely,

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