



Energia Response to SEMO

***Market Systems Development Plan 1st January 2026 –
31st December 2027***

08 December 2025

Introduction

Energia welcomes the opportunity to respond to the SEMO Market Systems Development Plan (MSDP) for 2026 and 2027. Energia previously responded to the prior MSDP covering the years of 2024 and 2025. Energia is open to discussing any aspect of its response bi-laterally with SEMO.

CRM System Changes

In our response to the previous MSDP consultation Energia emphasised its concerns that the system changes required to implement CRM modifications CMC_11_21 and CMC_09_22 on secondary trading had not been included. It is exceptionally frustrating that two years later, the modifications have neither been implemented. As per Energia's previous MSDP response, these modifications are critical to allow participants to better manage their risks in the CRM secondary trading market, and it is unacceptable that they are yet to be implemented more than four years after their approval by SEMC.

Energia acknowledges that in response to the previous MSDP consultation, SEMO stated that CRM modifications were outside of its remit and were the responsibility of the System Operators (SOs). However, it remains the case that in the introduction to this year's MSDP consultation, SEMO states that the MSDP "identifies predominantly the market facing changes that SEMO believes will facilitate the effective operation, administration, and development of the SEM, that impact on the SEMO systems, and proposes what investment projects are essential to support the needs of the market".

The CRM is a fundamental component of the SEM, and changes to it facilitate the effective operation, administration, and development of the SEM. While Energia understands that SEMO is limited as to the market and system changes it can make through its approved price control and the relevant codes and legislation, Energia's view is that the MSDP should more clearly set out what is and what is not in scope, and for those areas that are not in scope but remain essential to the functioning of the SEM, where and with which organisation responsibility for those areas sits.

Previously, SEMO regularly published a Roadmap for Market Development with the SOs, which gave participants a high-level overview of the main features and functional changes for the Ex-Ante, Capacity, Balancing and Settlement markets. The last version of the roadmap was published in December 2020. Since the discontinuation of the roadmap, regular written updates on the plans to progress the development of the CRM secondary trading system have ceased. Energia recommends that SEMO give consideration to returning to publishing a joint document with the SOs that holistically covers all the key SEM markets.

Other Comments

Energia welcomes the work that was done to progress the Scheduling and Dispatch Programme over the previous years. Energia's experience as a market participant of the implementation of SDP_02, Energy Storage Power Systems, was that the testing environment that was available prior to go-live was substantially lacking from a security and usability perspective. Energia would encourage SEMO to ensure that for forthcoming market and system changes, the testing environment has the necessary security features to best enable market participants to safely utilise it.

With regards to the Predictable CapEx Projects set out in section 2.5 of the MSDP, it would be beneficial if the MSDP listed the benefits that market participants can expect to experience from the completion of the CapEx project. This would better help participants understand how these projects have been prioritised.

We are generally supportive of the regular engagement that SEMO has undertaken in recent years through the Future Power Market forums and the MOUG. Energia would welcome continued engagement of this nature, including the opportunity to attend in-person events.

Regular and proactive engagement from SEMO is essential to ensure market participants are aware of all relevant developments. This was raised recently in specific relation to TSC Mod_04_25 on the Amendment of Payment Deferral, where participants requested they be kept regularly informed of SEMO's working capital position and forecast, and any potential for payment deferral to be enacted.