



Market System Development Plan  
1<sup>st</sup> January 2026 – 31<sup>st</sup> December 2027

## Consultation Report

### Abstract

This document is the MSDP consultation report developed by SEMO following the consultation regarding the MSDP for the period between 1 January 2026 and 31 December 2027.

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## 1 Introduction and Background

SONI and EirGrid, in their capacity as licenced Market Operator in Northern Ireland and Ireland respectively (together being the Single Electricity Market Operator ‘SEMO’), are required to produce a Market System Development Plan (MSDP) for approval by the Utility Regulator (UR) and the Commission for Regulation of Utilities (CRU) for the development of the Single Electricity Market (SEM) Trading and Settlement System. This plan is produced in accordance with Condition 16 of the SONI SEM Operator Licence and in accordance with Condition 4 of the EirGrid Market Operator Licence.

This Consultation Report document, published alongside the MSDP for 1 January 2026 to 31 December 2027, summarises the outcome of a [consultation process](#) which was undertaken by SEMO during November and December 2025.

SEMO received four responses to the consultation (Energia, The Electricity Association of Ireland (EAI), EP UK Investments (EPUKI) and Wind Energy Ireland). SEMO would like to thank all readers and respondents for their engagement.

Section 2 summarises the in-scope responses received and SEMO response.

In addition to the in-scope responses, SEMO also received commentary which was out of scope with respect to the MSDP. This material was passed on to the relevant functions for consideration.

This commentary included:

- Inclusion of a timeframe for the development of policy and the implementation of T&SC modifications including MOD\_13\_23 in relation to the treatment of non-priority dispatch renewables.
- Request for engagement on the Capacity Remuneration Mechanism design (CRM27+).
- Proposals for management, engagement and prioritisation on strategic programmes such as Long Duration Energy Storage (LDES), hybrids/sharing of Maximum Export Capacity (MEC), the Strategic Markets Programme and the TSO Demand Side Strategy.

## 2 Summary of In-Scope Consultation Responses

Summary of Representation(s) Received	SEMO Response
<p>Two respondents stated that the <b>scope of the MSDP</b> needs to be clearer. Another suggested a broadening of the scope of the MSDP.</p>	<p>Additional guidance on the scope of the MSDP and the basis for the scope has been added to the introduction.</p>
<p>Respondents commented on the <b>exclusion of Capacity Market system developments</b> including the system changes required to implement CRM modifications CMC_11_21 and CMC_09_22 on secondary trading.</p>	<p>SEMO is the settlement agent for the Capacity Market, however, the Capacity Market arrangements, core Capacity Market Systems and the Capacity Market Code and associated Capacity Market Modifications are functions of EirGrid and SONI as Transmission System Operator (TSO) under their respective TSO licences.</p> <p>As such these elements are not part of the Trading and Settlement Code and thus are outside of the scope of the MSDP.</p> <p>Additional guidance on the scope of the MSDP added to the introduction.</p>
<p>Two respondents recommended that the <b>Roadmap for Market Development</b> is reestablished as a publication.</p>	<p>Although this publication is not within the MSDP scope, SEMO acknowledges its value and will provide updates through monthly Future Power Markets Workshops.</p>
<p>One respondent urged SEMO to adopt a <b>more adaptable framework to efficiently integrate future changes</b> and emerging technologies into SEM systems. Respondents cited <b>concerns with the approach to prioritisation</b>, including as applied to participant driven change.</p>	<p>The SEM Market Systems operate within a highly complex architecture of interconnected platforms and data interfaces. To maintain stability and reliability in this environment, SEMO has adopted a structured development methodology, prioritising thorough requirements analysis, detailed design, robust development, and rigorous testing before implementing changes. This disciplined approach ensures system integrity and minimises risk. At the same time, SEMO recognises the need to evolve. We are actively exploring enhancements to our development process that will accelerate delivery and better enable integration of emerging technologies. By modernising our approach, we aim to strengthen agility without compromising the resilience and performance of the Market Systems.</p> <p>We will continue to communicate clearly on all market-facing changes, in line with our TSC and Agreed Procedure obligations — for example through AP11 release communications and high-level impact assessments. We'll also continue to use our existing channels, including Future Power Markets workshops, Market Operator User Groups, Modifications</p>

Summary of Representation(s) Received	SEMO Response
	Committee and Working Group meetings, and Market Messages
One respondent raised concerns in relation to <b>system testing environments</b> , citing a recent experience in relation to the Scheduling and Dispatch Programme.	Work is underway to develop test environments required under the Market Operator Licence. Any updates will be provided through the FPM Technical Groups and MOUG depending on what it relates to.
One respondent noted that the MSDP would benefit from <b>including the benefits to market participants of CAPEX projects</b> as it may assist in understanding prioritisation.	Additional detail on projects was included and published as part of the <a href="#"><u>SEMO 2024 - 2029 Price Control</u></a> process.
One respondent provided positive feedback on their experience of fora such as the Market Operator User Group (MOUG), encouraging in-person events. They requested <b>proactive communication</b> to keep participants informed.	SEMO will continue to engage with industry via various, frequent and existing channels such as: Market Operator User Group (MOUG); Trading and Settlement Code (T&SC) Modifications Committee; Future Power Markets (FPM) workshops and Newsletter; and SEMO workshops;
One respondent requested the inclusion of the <b>Carbon Border Adjustment Mechanism (CBAM)</b> in the MSDP due to its impact on market signals, transparency, and regulatory oversight.	CBAM, as an Interconnector Operator responsibility, is out of scope for the MSDP. Updates on CBAM are provided through the monthly Future Power Markets (FPM) workshops.
One respondent noted that the MSDP would benefit from the inclusion of a line item within the Unpredictable CapEx Projects to reflect system changes arising from participant modification proposals.	Changes arising from all Modification Proposals, including Participant Modification proposals, are delivered in releases as set out in section 2 of the MSDP and as such funded through Market Release Capital.