

# Annual Audit of the Scheduling and Dispatch Process

2026 and 2027 Terms of Reference  
Consultation on the Proposed  
Scope

09/06/2026



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# Contents

1. Introduction to Consultation	4
2. Reporting Requirements	5
3. Proposed Scope of the 2026 and 2027 Audits	5
4. Scope Exclusions	10
5. Consultation Process	11

# 1. Introduction to Consultation

In compliance with Paragraph 9 of [Condition 10A](#) and [Condition 22A](#) of the respective Transmission System Operator Licenses, EirGrid plc and SONI Limited ('the Transmission System Operators') are required to undertake a periodic audit of the operation and implementation of the scheduling and dispatch process. The Scheduling process involves determining the optimal combination of committed generation units to be scheduled to meet the forecasted demand over the next 30 hours. This process ensures that the subsequent dispatch of the committed units during this 30-hour period maintains a secure and reliable operation of the transmission system. The Long-Term Schedules provide generators with an initial 30-hour dispatch schedule, detailing the committed units and their expected dispatch levels for the upcoming 30-hour period. This enables the TSO to optimally schedule and dispatch the available generation resources to match the anticipated demand while adhering to system security constraints and operational requirements. Dispatch is the process of balancing supply and demand in real-time while meeting all the security constraints and maximizing the output from priority units.

The license conditions state that -

'The Licensee shall arrange for the carrying out of a periodic audit of the scheduling and dispatch process, its operation and implementation in accordance with directions given to it from time to time ... in respect of such matters as ... (the Commission for Regulation of Utilities and the Utility Regulator (collectively referred to as 'the Regulatory Authorities')) ... considers appropriate, including...

- (A) the frequency, audit period, process and timetable for the audit.
- (B) the selection, appointment and tenure of a person or firm to carry out the audit.
- (C) the terms of reference for the audit.
- (D) the publication of the audit report and of any other relevant materials;

The 2026 audit period will be from 01 January 2026 to 31 December 2026 inclusive ("2026 audit"). The 2027 audit period will be from 01 January 2027 to 31 December 2027 inclusive ("2027 audit").

This document sets out the Terms of Reference ("ToR") for both the 2026 and 2027 audits of the scheduling and dispatch process including the proposed scope. The Transmission System Operators welcome the views of interested parties on the scope proposed in Section 3.

The previous Scheduling and Dispatch audit ToR document was for the two-year period covering calendar years 2024 and 2025; similarly, this document is for a two-year period covering calendar years 2026 and 2027 and is largely unchanged with the exception of the following:

- The articles under the Cza (Cross-zonal Actions) pillar have been included in the scope

## 2. Reporting Requirements

The outcome of the 2026 audit and the 2027 audit, which will be undertaken by an independent external Auditor, will be an Assurance Report for each audit period covering the full calendar year of January to December, which includes an opinion over the Transmission System Operators' compliance with specific regulatory requirements as they relate to specified elements of the scheduling and dispatch process for the audit periods.

The engagement will be a Reasonable Assurance engagement in line with the International Standard on Assurance Engagements 3000 (Revised), - 'Assurance engagements other than audits or reviews of historical financial information' issued by the International Auditing and Assurance Standards Board.

The Assurance Report will consist of an Opinion which refers to an Approach Document which may include detailed information on the terms of the engagement, the applicable criteria that were used, findings identified in relation to particular aspects of the engagement, details of qualifications identified, details of the experience of the practitioner and the individuals involved in the engagement, disclosure of materiality levels, and any recommendations of note.

The Auditor, in undertaking their assessment, will assess the risk of a material non-compliance in relation to the licenses and codes which are within the scope of the Assurance Report. In areas where they identify specific risks, or where weaknesses are identified in the operation of specific internal controls, further substantive tests will be executed. The Auditor will present this assessment of applicable risks and responses in the 2026 Audit and 2027 Audit Assurance Reports. The intention is that the Audit Assurance Report and Approach document will be issued to the Regulatory Authorities within six months of the end of each audit period. However, the lead time will be dependent on the extent and publication date of the scope. Furthermore, the audit report for the years 2026 and 2027 will subsequently be published by the Transmission System Operators in 2027 and 2028 respectively.

## 3. Proposed Scope of the 2026 and 2027 Audits

The audit of the scheduling and dispatch process is separate to the SEM Trading & Settlement Code Market Audit and the SEM Capacity Market Code Market Audit. The obligations for those audits are set out in the Trading and Settlement Code and the Capacity Market Code. The Transmission System Operators intend that the scope of those audits remains separate to the audit of the scheduling and dispatch process.

The Transmission System Operators intend that the scope of the scheduling and dispatch process audit will consist of an assessment in respect of our compliance with regulatory requirements (collectively called 'The Requirements') as they relate to specified elements of the scheduling

and dispatch process for the periods 01 January 2026 to 31 December 2026 and 01 January 2027 to 31 December 2027.

It is the responsibility of the Auditor, to assess on a sample basis, the compliance of the Transmission System Operators with The Requirements in respect of the specified elements of the scheduling and dispatch process as noted below.

**Matters which will be considered within the scope of the Assurance Report**

The Requirements outlined below as they relate to specified elements of the scheduling and dispatch process are proposed for inclusion within scope for the 2026 Audit and subsequent 2027 Audit.

#	In Scope Items	Criteria EirGrid <sup>1</sup>	Criteria SONI <sup>1</sup>
1	Priority Dispatch	<p><a href="#">EirGrid TSO License</a> Condition 10A - Para. 4(a)/(b) &amp; 5(f), (i)</p> <p>The areas included, but not limited to:</p> <ul style="list-style-type: none"> <li>• Resource balancing table</li> <li>• Curtailment Events</li> <li>• Constraint Events</li> <li>• Wind logs</li> </ul> <p>Other requirements:  <a href="#">SEM-11-062</a> Principles of Dispatch and the Design of the Market Schedule in the Trading and Settlement Code SEM Committee Decision Paper</p> <p>For reference on how Priority Dispatch is implemented within Schedule and Dispatch, see <a href="#">BMPS Section 3.1, 4.4.4 and 4.5.2, and Appendix 1.3.</a></p>	<p><a href="#">SONI TSO License</a> Condition 22A - Para. 4(a)/(b) &amp; 5(f), (i) Condition 9A</p> <p>The areas included, but not limited to:</p> <ul style="list-style-type: none"> <li>• Resource balancing table</li> <li>• Curtailment Events</li> <li>• Constraint Events</li> <li>• Wind logs</li> </ul> <p>Other requirements:  <a href="#">SEM-11-062</a> Principles of Dispatch and the Design of the Market Schedule in the Trading and Settlement Code SEM Committee Decision Paper</p> <p>For reference on how Priority Dispatch is implemented within Schedule and Dispatch, see <a href="#">BMPS Section 3.1, 4.4.4 and 4.5.2, and Appendix 1.3.</a></p>

<sup>1</sup> Links to current versions of licenses and codes provided for clarity. If any new versions to these specific licenses and codes are published after the date of this consultation, the cited paragraphs in each of the licenses and codes will remain in scope provided that there are no material changes to the substance of the paragraph. In the case of material changes to the substance of the paragraphs, the scope will need to be reconsidered by the TSO. The final scope of licenses and codes for 2026 and 2027 Audits will be published in the respective Assurance Reports.

2	Cross Zonal Actions	<p>The criteria and principles for the Cross Zonal Action process are outlined in Articles 3:15 and 3:16 of the <a href="#">Interim Cross Zonal TSO Arrangements for GB-ISEM go live</a>, suitable for an ISAE 3000 engagement.</p> <p>The methodology and process defined in the <a href="#">Day-Ahead Interconnector Net Transfer Capacity (NTC) Procedure</a> used to determine NTC values for interconnectors. <a href="#">Interconnector-Net-Transfer-Capacity-Calculation-Procedure-June-2024.pdf</a>)</p> <p>Any other relevant document, system, or procedure that supports the application of Cross-Zonal Actions and informs System Operator decision-making, where such application has a direct impact on system security during the Scheduling and Dispatch timeframe.</p> <p><a href="#">SEM-24-025 Compensation Arrangements for Net Transfer Capacity Reductions Section 6</a></p> <p>For reference on how Prices and Volumes for Cross-Zonal Action are implemented within Schedule and Dispatch, see <a href="#">BMPS Section 3.3 and 3.4.6</a></p>	<p>The criteria and principles for the Cross Zonal Action process are outlined in Articles 3:15 and 3:16 of the <a href="#">Interim Cross Zonal TSO Arrangements for GB-ISEM go live</a>, suitable for an ISAE 3000 engagement.</p> <p>The methodology and process defined in the <a href="#">Day-Ahead Interconnector Net Transfer Capacity (NTC) Procedure</a> used to determine NTC values for interconnectors. <a href="#">Interconnector-Net-Transfer-Capacity-Calculation-Procedure-June-2024.pdf</a>)</p> <p>Any other relevant document, system, or procedure that supports the application of Cross-Zonal Actions and informs System Operator decision-making, where such application has a direct impact on system security during the Scheduling and Dispatch timeframe.</p> <p><a href="#">SEM-24-025 Compensation Arrangements for Net Transfer Capacity Reductions Section 6</a></p> <p>For reference on how Prices and Volumes for Cross-Zonal Action are implemented within Schedule and Dispatch, see <a href="#">BMPS Section 3.3 and 3.4.6</a></p>
3	Dispatch Instructions	<p><a href="#">EirGrid TSO License</a> Condition 10A - Para. 2, 4 and 5</p> <p>The areas included, but not limited to:</p> <ul style="list-style-type: none"> <li>• Frequency (Condition 10A Para 2, EirGrid Grid Code CC. 8.2.1)</li> <li>• Physical Notifications (Condition 10A Para 2(a)(i), 4 and 5(b))</li> <li>• Generators declaring unavailable (Condition 10A Para 2(a)(ii))</li> </ul>	<p><a href="#">SONI TSO License</a> Condition 22A - Para. 2, 4 and 5</p> <p>The areas included, but not limited to:</p> <ul style="list-style-type: none"> <li>• Frequency (Condition 22A Para 2, SONI Grid Code CC. 5.3.1)</li> <li>• Physical Notifications (Condition 22A Para 2(a)(i), 4 and 5(b))</li> <li>• Generators declaring unavailable (Condition 22A Para 2(a)(ii))</li> </ul>

		<ul style="list-style-type: none"> <li>• Generation units not subject to central dispatch (Condition 10A Para 2(a)(iv))</li> <li>• Transmission System Outage (Condition 10A Para 2(b))</li> <li>• Daily forecast demand (Condition 10A Para 4 and 5(a))</li> <li>• Scheduling and Dispatch Policy Parameters (Condition 10A Para 4 and 5(c))</li> <li>• Generators Technical Offer data (Condition 10A Para 4 and 5(e))</li> <li>• Interconnector Reference Programs (“ICRPs”) (Condition 10A Para 4 and 5(f))</li> </ul> <p>Other requirements:</p> <p>For 2026 Audit Period: <a href="#">SEM-25-059 Trading and Settlement Code Scheduling &amp; Dispatch Parameters 2026 Decision Paper</a></p> <p>2027 Scheduling and Dispatch Parameters consultation has not yet taken place.</p> <p><a href="#">EirGrid Grid Code</a> CC. 8.2.1</p> <p>For reference on how Dispatch Instructions are implemented within Schedule and Dispatch, see <a href="#">BMPS Section 4.4</a></p>	<ul style="list-style-type: none"> <li>• Generation units not subject to central dispatch (Condition 22A Para 2(a)(iv))</li> <li>• Transmission System Outage (Condition 10A Para 2(b))</li> <li>• Daily forecast demand (Condition 10A Para 4 and 5(a))</li> <li>• Scheduling and Dispatch Policy Parameters (Condition 22A Para 4 and 5(c))</li> <li>• Generators Technical Offer data (Condition 22A Para 4 and 5(e))</li> <li>• Interconnector Reference Programs (“ICRPs”) (Condition 22A Para 4 and 5(f))</li> </ul> <p>Other requirements:</p> <p>For 2026 Audit Period: <a href="#">SEM-25-059 Trading and Settlement Code Scheduling &amp; Dispatch Parameters 2026 Decision Paper</a></p> <p>2027 Scheduling and Dispatch Parameters consultation has not yet taken place.</p> <p><a href="#">SONI Grid Code</a> CC 5.3.1</p> <p>For reference on how Dispatch Instructions are implemented within Schedule and Dispatch, see <a href="#">BMPS Section 4.4</a></p>
4	Merit Orders	<p><a href="#">EirGrid TSO License</a> Condition 10A - Para. 3</p> <p>The areas included, but not limited to:</p> <ul style="list-style-type: none"> <li>• Online Merit Orders</li> <li>• Offline Merit Orders</li> </ul> <p>Other requirements:</p> <p><a href="#">EirGrid Grid Code</a> SDC 1.4.7.3 / SDC1.4.7.4 and SDC2.4.2.14</p>	<p><a href="#">SONI TSO License</a> Condition 22A - Para. 3</p> <p>The areas included, but not limited to:</p> <ul style="list-style-type: none"> <li>• Online Merit Orders</li> <li>• Offline Merit Orders</li> </ul> <p>Other requirements:</p> <p><a href="#">SONI Grid Code</a> SDC 1.4.8.3 / SDC1.4.8.4 and SDC2.4.2.14</p>

		For reference on how Merit Order is implemented within Schedule and Dispatch, see <a href="#">BMPS Section 2.3</a>	For reference on how Merit Order is implemented within Schedule and Dispatch, see <a href="#">BMPS Section 2.3</a>
5	Operational Constraints	<p><a href="#">EirGrid TSO License</a> Condition 10A - Para. 4(a)(b) &amp; 5(d)</p> <p>The areas included, but not limited to:</p> <ul style="list-style-type: none"> <li>• System reserves</li> <li>• Inertia</li> <li>• Operating limits</li> <li>• Tie Line Values</li> </ul> <p>For reference on how Operational Constraints are implemented within Schedule and Dispatch, see <a href="#">BMPS Section 3.4.3 and 4.5.1</a></p>	<p><a href="#">SONI TSO License</a> Condition 22A - Para. 4(a)(b) &amp; 5(d)</p> <p>The areas included, but not limited to:</p> <ul style="list-style-type: none"> <li>• System reserves</li> <li>• Inertia</li> <li>• Operating limits</li> <li>• Tie Line Values</li> </ul> <p>For reference on how Operational Constraints are implemented within Schedule and Dispatch, see <a href="#">BMPS Section 3.4.3 and 4.5.1</a></p>
6	Constraint Flagging	<p><a href="#">Trading and Settlement Code</a> Flagging of Accepted Bids and Offers E.3.3.1</p> <p>Trading and Settlement Code Part B Appendices, APPENDIX N: Flagging and Tagging, System Operator and Non-Marginal Flagging Paragraph 1-5</p> <p>The areas included, but not limited to:</p> <ul style="list-style-type: none"> <li>• System Operator flags (Methodology for Determining System Operator and Non-Marginal Flags (2.1,2.2))</li> <li>• Non-Marginal flags (Methodology for Determining System Operator and Non-Marginal Flags (2.3))</li> </ul>	<p><a href="#">Trading and Settlement Code</a> Flagging of Accepted Bids and Offers E.3.3.1</p> <p>Trading and Settlement Code Part B Appendices, APPENDIX N: Flagging and Tagging, System Operator and Non-Marginal Flagging Paragraph 1-5</p> <p>The areas included, but not limited to:</p> <ul style="list-style-type: none"> <li>• System Operator flags (Methodology for Determining System Operator and Non-Marginal Flags (2.1,2.2))</li> <li>• Non-Marginal flags (Methodology for Determining System Operator and Non-Marginal Flags (2.3))</li> </ul>

		<u>Methodology reference:</u> Methodology for determining system operator and non-marginal flags.	<u>Methodology reference:</u> Methodology for determining system operator and non-marginal flags.
7	IT General Controls required to support the areas noted in items 1-6 above	While not specifically discussed in the regulations, the TSO's maintenance of IT General Controls over key systems supporting items 1-6 above is key to the overall testing approach. The testing focused on the following areas, where applicable, in respect of controls owned and operated by the Transmission System Operators over the in-scope systems - being; Market Management System ("MMS"), Electronic Dispatch Instruction Logger ("EDIL"), Wind Dispatch Tool ("WDT") and Interconnector Management Platform ("ICMP").	

## 4. Scope Exclusions

The following is specifically excluded from the Assurance Engagements

- The algorithms associated with the optimization engines, which produce the Long-Term Scheduling ("LTS"), Real Time Commitment ("RTC") and Real-Time Dispatch ("RTD") schedules, used in the scheduling and dispatch process.
- The Imbalance Pricing process which takes place after the scheduling and dispatch process has ended.
- Validation of data submitted to the Transmission System Operators by participants.
- Inputs such as forecasts which are provided by third parties.
- Inputs such as transmission and generator outage plans.
- The derivation of operational constraints;
- Actions taken with market participants by the Transmission System Operators to resolve performance issues during the scheduling and dispatch process;
- An assessment of the compliance of the Transmission System Operators in relation to any regulations other than those specifically referenced in the table above.
- Any regulations which are cross referenced within the regulations listed as the criteria but not specifically identified as criteria themselves, other than those specifically referenced in the table above.

- Validation that data published in relation to the specified elements of the scheduling and dispatch process on the EirGrid (<https://www.eirgrid.ie/>), SONI (<https://www.soni.ltd.uk/>), and SEMO (<https://www.sem-o.com/>) websites is complete and accurate unless specifically included in testing procedures, for example, Operational Constraint Updates;
- An assessment of the compliance of the company in relation to the Regulation on Wholesale Energy Markets Integrity and Transparency (REMIT); pending the implementation of a full solution, at which time it will be considered for inclusion.
- An assessment of the real-time operating decisions that The Transmission System Operators make when actioning internal operating procedures relevant to the specified elements of the scheduling and dispatch process.
- Validation that system security has been maintained at all times; and
- Any actions associated with Interim Cross Zonal TSO Arrangements for GB-ISEM go-live (ICZA) that are not System Operator actions or are long term System Operator actions that take place ahead of Scheduling and Dispatch outside of the S&D timeframe, such as long-term capacity calculations and capacity auctions.

## 5. Consultation Process

The Transmissions System Operators welcome the views of interested parties on the proposed scope as described in Section 3, specifically on the matters which will be considered in scope and matters which will be excluded for the 2026 and 2027 Audits engagements.

Respondents are kindly requested to address the proposed inclusions and exclusions directly in their response and to provide a basis for additional inclusions or exclusions i.e. citing a relevant license, code, or legal obligation.

The Transmission System Operators are including the scope for 2027 in this consultation to have the ability to start the audit process for 2027 as soon as possible after the conclusion of the 2026 audit.

The proposed scope is in line with the previous audit with the exception as stated in Section 1 Paragraph 4. Respondents therefore may wish to consider the [2024 Assurance Report and Approach document](#) in developing their feedback.

Respondents should submit their feedback via email to [OpsCompliance@eirgrid.com](mailto:OpsCompliance@eirgrid.com) and/or [OpsCompliance@SONI.ltd.uk](mailto:OpsCompliance@SONI.ltd.uk) before **5pm on Friday 17th July 2026.**