SEM committee

Mod_01_26: Implementation of ASP decision SEM-25-029

Updated Presentation

18th June 2026

Background

- EY's CRM review, in 2022, found the ASP mechanism was not effectively calibrated to deliver price volatility during system stress.

- Currently, Short Term Reserve Quantity (qSTR) is defined to be the sum of the available Replacement Reserve and the available TOR2, which was being compared with the required reserve in just one of the two categories. Hence, the ASP miscalibration.

- In July 2023, the SEM Committee launched a consultation proposing changes to the Reserve Scarcity Price trigger (SEM-23-047).

- Following review of consultation feedback, the SEM Committee published its decision in June 2025.

SEM Committee Decision

- Redefined qSTR to include only **Replacement Reserves**, i.e., removed reference to TOR2.

- Proposed terminology change in the T&SC:
  - *Short Term Reserve Quantity* → Available Reserve Quantity
  - *Operating Reserve Requirement Quantity* → Required Reserve Quantity

Modifications Committee Meeting 134

- Mod_01_26 was raised and presented at the Modifications Committee Meeting 134 in April 2026, to ensure the T&SC reflects the policy decision already made and set out in SEM-25-029, with changes proposed to be made to E.4.2, E.4.3 and the Glossary.

- A vote on the Modification was deferred to the Modifications Committee Meeting 135 in June 2026.

- The RAs (as proposers) took an action to provide requested clarifications from members in advance of the next meeting to allow members to review the requested information.

- The next few slides provide the requested information.

- **The RAs are now asking the Committee to confirm that they are satisfied that the changes proposed in Mod_01_26 reflect SEM Committee Decision, SEM-25-029.**

Questions from Committee

- ***Further impact analysis covering ideally covering the last 24 months on whether ASP would have triggered had this Modification been in place.***

- ***If that is too onerous for the RAs, a better understanding of how they collect the data so that they can subtract TOR2 from the current Short Term Reserve Quantity, and whether generators can do this modelling themselves.***

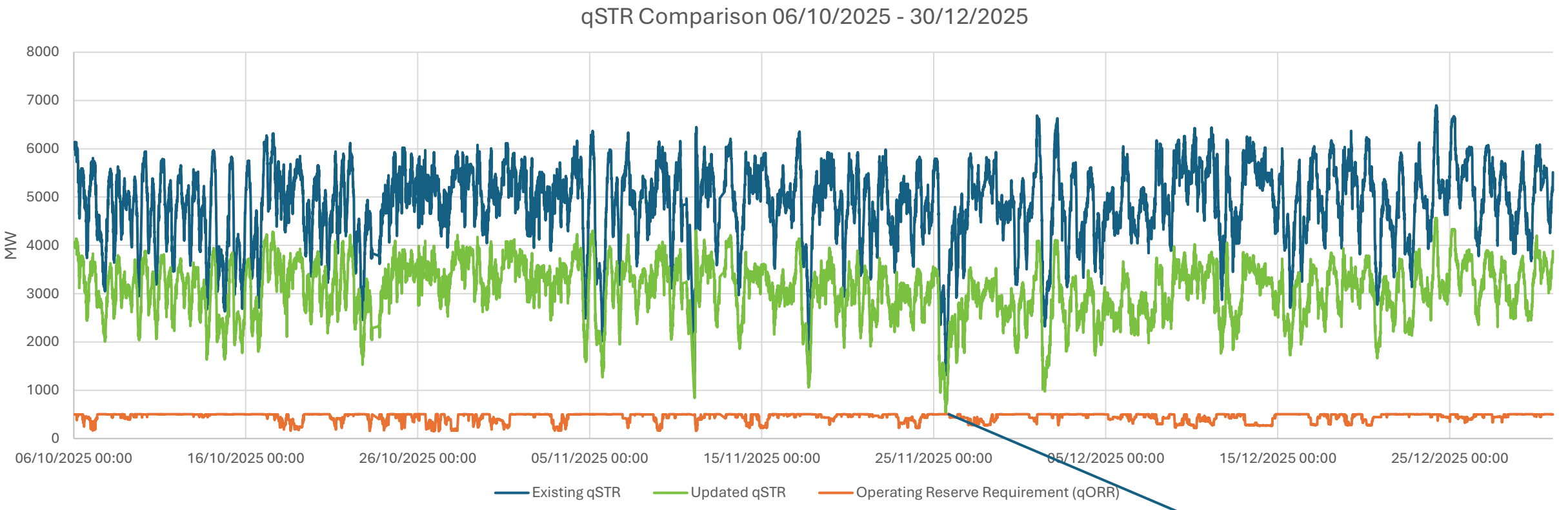
- The next couple of slides show the impact Mod_01_26 would have had, had it been in place, on the qSTR measure, plotted against the qORR and the current qSTR.

Response to Query

- The following graphs are modelled using data provided by SEMO.
- The data range is between 06/10/2025 and 30/12/2025.
- This is representable of the 24 months requested due to occurrences of a number of system margin warnings.
- The charts show that even with Mod_01_26 in place, the qSTR would not have fallen below the qORR.

Chart	Data Range	Link
1	06/10/2025 – 30/12/2025	
2	14/10/2025	System Margin Warning in Ireland from 16:30 to 20:30, linked here.
3	22/10/2025	System Margin Warning in Ireland from 17:00 to 21:30, linked here.
4	04/11/2025	System Margin Warning in Ireland from 16:40 to 19:40, linked here.
5	05/11/2025	System Margin Warning in Ireland from 16:25 to 20:50, linked here.
6	25/11/2025	System Margin Warning in Ireland from 09:00 to 20:00, linked here.
7	01/12/2025	System Margin Warning in Ireland from 11:25 to 13:40, linked here.

Chart 1: qSTR Comparison 06/10/2025 – 30/12/2025



On 25 November 2025, qSTR would have come close to dropping below qORR had Mod_01_26 been in place, but does not (see slide 8)

Chart 2: System Margin Warning 1 – 14/10/2025

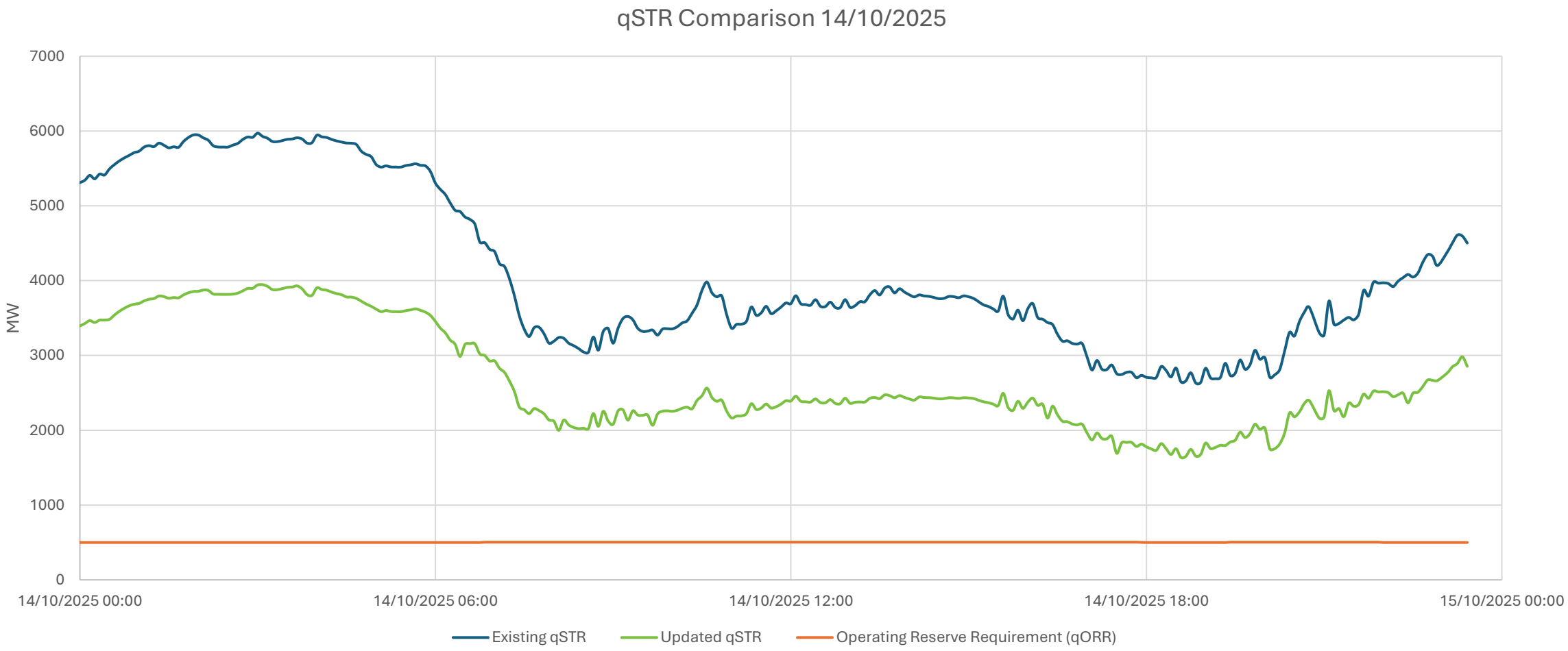
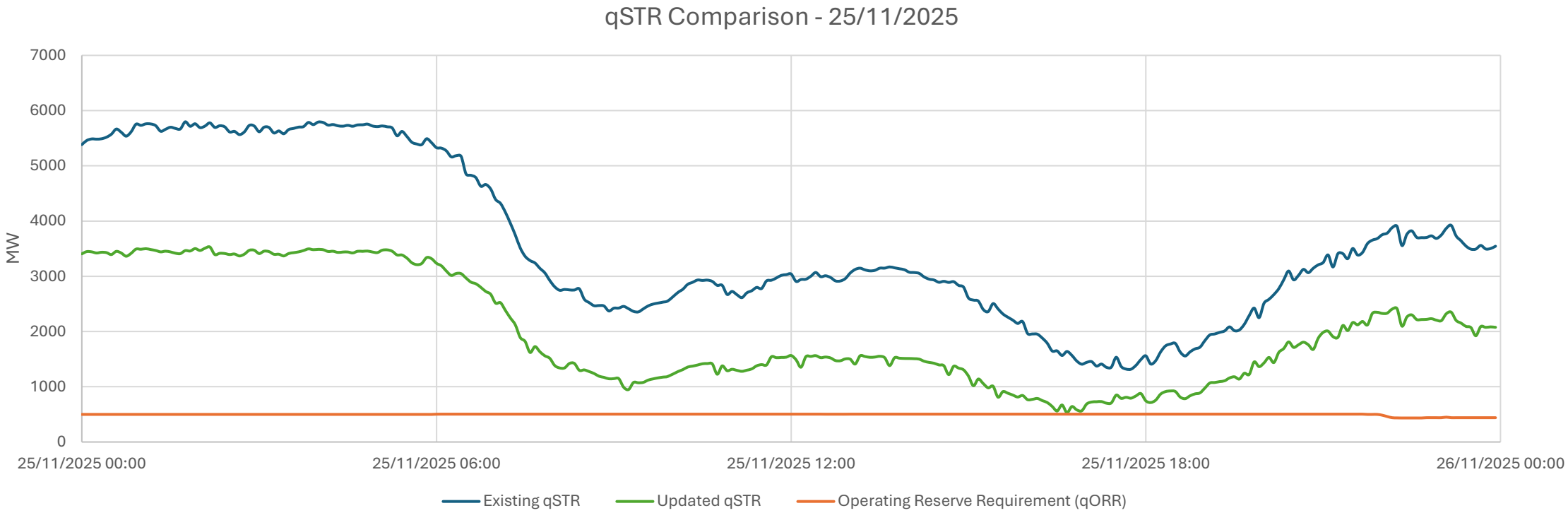


Chart 6: System Margin Warning 5 – 25/11/2025



Imbalance Pricing Period	Existing qSTR*	Updated qSTR*	Operating Reserve Requirement (qORR)*	Margin (Existing qSTR – qORR)*	Margin (Updated qSTR - qORR)*
25/11/2025 16:30	1649.257	561.045	503.964	1145.293	57.081
25/11/2025 16:40	1638.897	531.206	503.964	1134.933	27.242
25/11/2025 16:50	1465.127	580.608	503.964	961.163	76.644
25/11/2025 16:55	1408.514	565.136	503.964	904.55	61.172

*All figures in MW

Question from Committee

- ***A tangible and detailed update on progress regarding secondary trading above de-rated capacity in the CRM, including implementation of the decision taken regarding CMC_11_21.***

- On **24 April 2026**, the SEM Committee published the RA review of the System Operators' impact assessment and decision regarding implementation of two paragraphs (M.12.3.1 and M.12.3.2) of the legal drafting for CMC_11_21 – see SEM-26-022.

- The RAs have invited the proposer of CMC_11_21 to submit a new Modification Proposal, which the RAs understand will be submitted for discussion at CMC Modifications Workshop 50 in **July 2026**.

- On receipt of the proposal and discussion of the new proposal, the RAs will progress the CMC Modification via the prescribed process in the CMC and a period of industry consultation will follow after publication of a consultation paper and a decision will be published after review of the feedback.

- The RAs will work closely with the TSOs to achieve timely implementation of approved Modification.

Question from Committee

- ***Further information on how the proposed change will interact with DASSA, and the question of whether the Short-Term Reserve Requirement will continue to be separate from the Day-Ahead Replacement Requirement that will be set by the TSOs.***

- qSTR is a measurement for the purpose of the RSP trigger in the T&SC and not a target for procuring reserves.

- The SEMC FASS Volume Forecasting Methodology, (SEM-25-011) sets out the method for forecasting all reserve services. The requirement for all of the services is going to be based on the LSI/LSO + Consequential Losses. The SEM Committee has not approved the consequential losses at this point; there was a requirement for the TSOs to consult further.

Comment and Question from Committee

- ***It is important for EPUKI as a Generator to have a day-to-day overview over how the current and the updated qSTR perform against the qORR and how the interruptible load feeds into the new qSTR.***

- See charts from earlier slides and Annex 1 for how the current and updated qSTR has performed over the period analysed.

- ***What real-life scenarios would have to occur for the qSTR to drop underneath the level of qORR?***

- Sudden loss of large generation (an interconnector / large thermal plant trips);

- Planned and forced outages occurring simultaneously;

- Dramatic changes in wind generation

Annex 1

Chart 3: System Margin Warning 2 – 22/10/2025

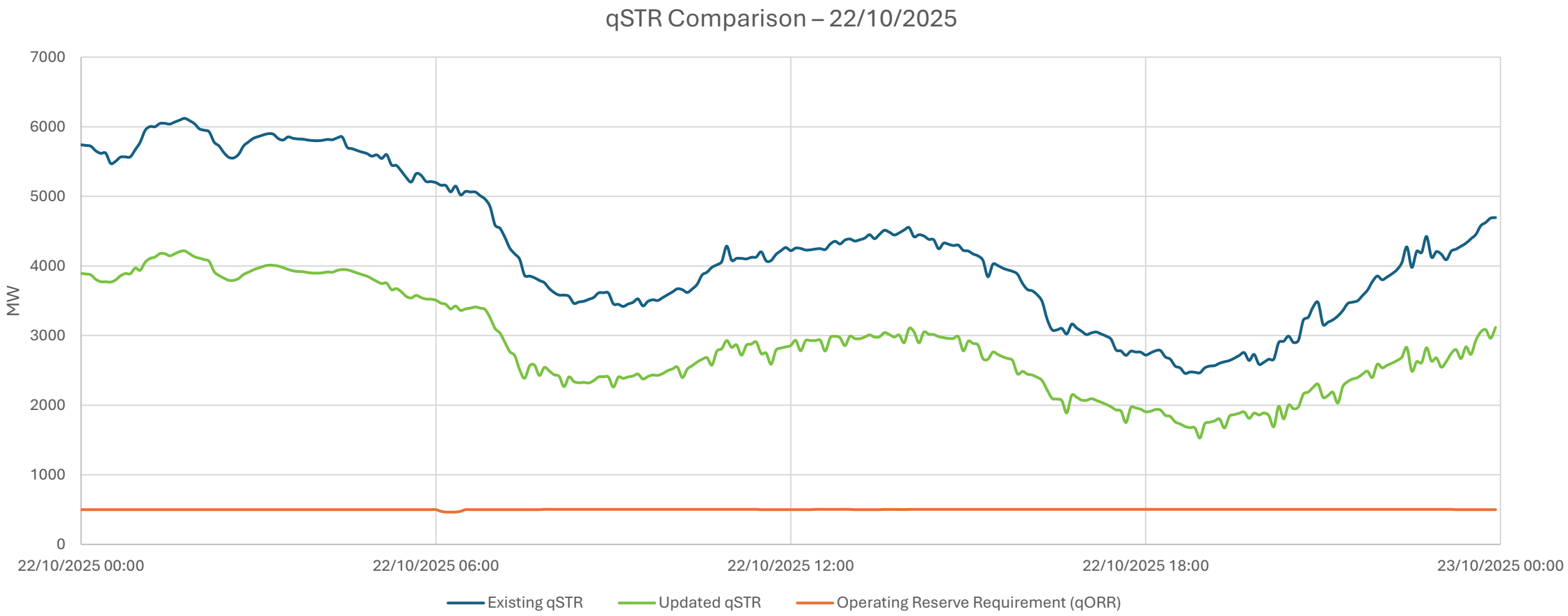


Chart 4: System Margin Warning 3 – 04/11/2025

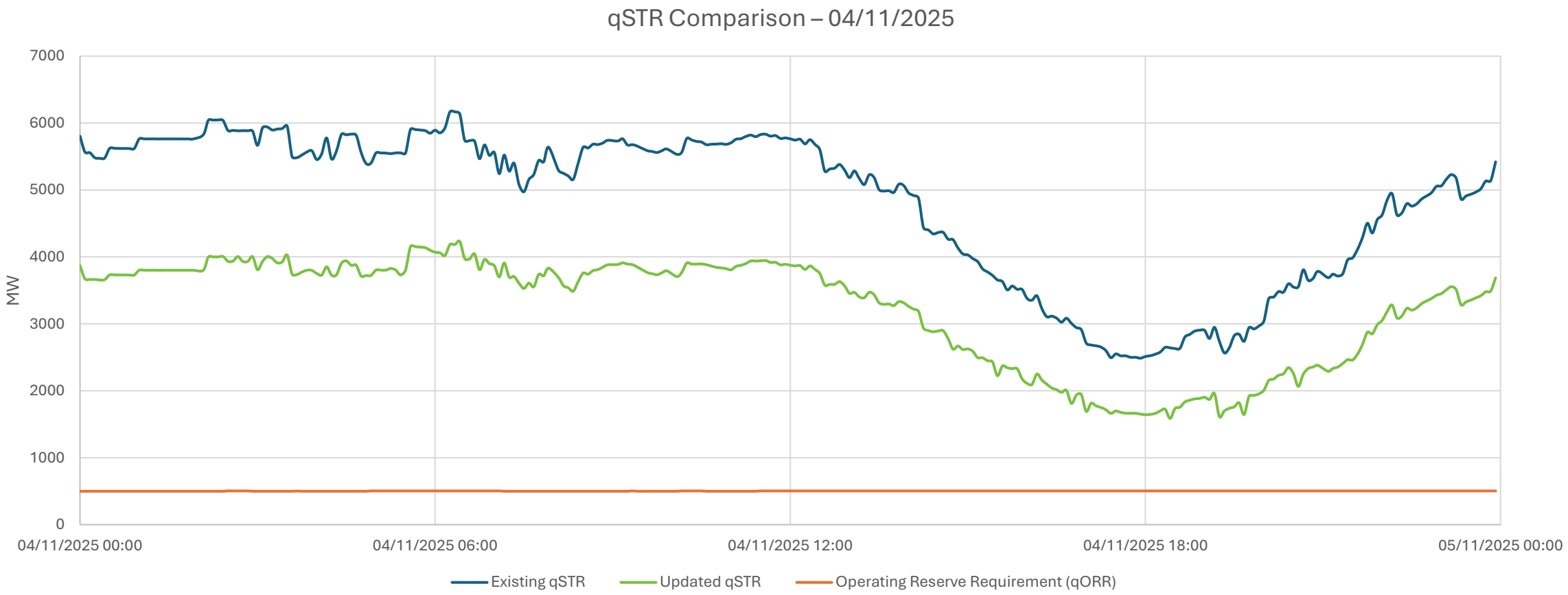


Chart 5: System Margin Warning 4 – 05/11/2025

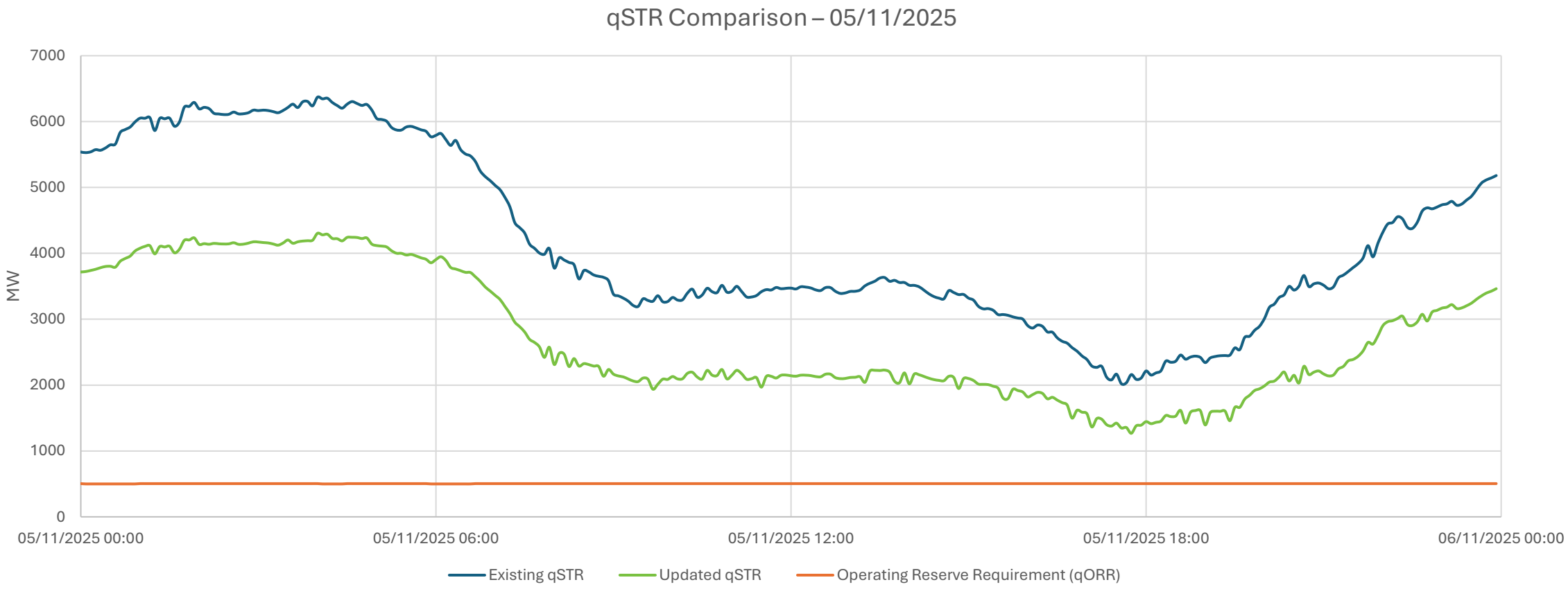


Chart 7: System Margin Warning 6 – 01/12/2025