

Consultation Report

Balancing Market Principles Statement Version 10.0

25 August 2026



Introduction

The objective of the BMPS and associated documents is to provide a clear and comprehensible description of the scheduling and dispatch process. This consultation report has been prepared for the Regulatory Authorities following consultation with industry on revisions to the Balancing Market Principles Statement (BMPS).

We published Version 1.0 of the BMPS in September 2017 following a consultation on the format, style and content of the document. Following this, the BMPS has been updated on an annual basis, with revisions proposed and consulted on with industry prior to publication. Version 9.0 was published on the 12th August 2025 following consideration of consultation responses.

On the 14th May 2026 we published, for consultation, Version 9.1 of the BMPS which included numerous proposed revisions. The consultation closed on the 15th June 2026. We received representations from five respondents namely BnM, TTEP, Electricity Association of Ireland (EIA), Energy Storage Ireland (ESI) and ESB Generation and Trading (GT).

This consultation report sets out a summary of the consultation representations we received. We have sought to address representations at an aggregated level in this document and, where appropriate, in the updated BMPS - Version 9.2, which we are now submitting to the SEM RAs for consideration.

The evolution of the BMPS is set out in the appendix below.

Scope of Revisions

As per Condition 10B and 22B of EirGrid and SONI's Transmission System Operator Licences respectively we are required to ensure that the BMPS is accurate and up to date, to propose revisions as necessary and to consult market participants on the changes. The more significant revisions in the document are tabulated below. Table 1 lists the revisions which were proposed in the consultation.

Section	Update /Revision/ Reason for revision
Important information	EirGrid Transmission System Operator Licence updated to 10 April 2026
	SONI Transmission System Operator Licence updated to 17 April 2026
	EirGrid Grid Code updated to version 16, 17 October 2025
	SONI Grid Code updated to September 2025
	Trading and Settlement Code updated to Version 31.0, 13 November 2025
Terms and Definitions	Demand Side Unit (DSU) definition updated
	Energy Limited Generator Unit definition updated
	Net Transfer Capacity (NTC) definition updated
	SOGL definition updated
	Synchronous Condenser definition updated
	Temporary Emergency Generation (TEG) definition updated
	Units' definition updated
2.4 Provision of Transparency	The reference in Section 2.4 (Provision of Transparency) to the previous REMIT implementing regulation was revised and replaced with an updated reference to the current Commission Implementing Regulation governing data-reporting obligations under REMIT. This update reflected changes to the REMIT data-reporting framework since the publication of BMPS version 9.0 and ensured that the description of the TSOs' transparency obligations remained current and accurate.
3.1.1 Priority Dispatch	The text in Section 3.1.1 (Priority Dispatch) was revised to remove the statement that the priority dispatch hierarchy "is being updated to align with the delivery of the Scheduling and Dispatch Programme".

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	This statement was replaced with wording confirming that, following SEM Committee direction in February 2024, an amended Priority Dispatch Hierarchy has been approved and that implementation is underway through scheduling and dispatch under the SDP01 Non-Priority Dispatch Renewables initiative. This update reflects the progression from describing a future alignment activity to describing an approved change that is now in the process of being implemented.
3.1.2 Scheduling and Dispatch Policy Parameters	The references in Section 3.1.2 to earlier SEM Committee decisions have been updated and replaced to reflect the most recent SEM Committee determinations on Long-Notice Adjustment Factors (LNAF) and System Imbalance Flattening Factors (SIFF). The previous text, which referenced earlier decision timelines, was replaced with updated references to SEM Committee Decisions SEM-25-059, confirming that LNAF and SIFF are set to zero for the period 1 January 2026 to 31 December 2026, with a further consultation to be carried out in mid-2026 to determine the values to apply from January 2027. This update reflects the current SEM Committee position.
3.2.3 Physical Notifications	Section 3.2.3 (Physical Notifications) was updated to include additional clarification on the treatment of battery units when submitting Physical Notifications. The new text clarified that battery unit participants may submit both positive and negative Physical Notifications to reflect their intended output, and that such submissions are treated consistently with those of other units. It further clarified that Physical Notifications must be physically feasible, including with respect to the unit's Technical Offer Data and projected state of charge at the time of submission. This clarification reflects industry guidance previously communicated in relation to the feasibility of battery Physical Notifications and is intended to improve clarity and consistency in the application of Physical Notification requirements for battery units.
3.2.4 Availability and System Services Capability Declarations	The text in Section 3.2.4 relating to the declaration of availability for battery units was updated to reflect the implementation status of the Scheduling and Dispatch Programme. The previous wording, which described the development and future publication of operational procedures for battery availability declarations, was removed. This was replaced with updated text confirming that, following the go-live of the Scheduling and Dispatch Programme, Battery ESPS units declare availability through

Section	Update /Revision/ Reason for revision
	operational systems including EMS and EDIL, with the applicable operational arrangements described in the Overview of SDP Solutions for Battery Units. Footnote 11 was updated to reflect the Overview of SDP Solution for Battery Units, consistent with current Scheduling and Dispatch Programme arrangements.
3.4.3 Constraints	Section 3.4.3 was updated to reference the EirGrid and ESB Networks Multi-Year Plan (2025-2029) for clarity in describing the development of TSO-DSO Operating Models. The updated was to reflect developments in TSO-DSO operating arrangements. The section was updated to confirm that the SONI-NIE Networks TSO-DSO Operating Model became operational in 2025, coinciding with the introduction of NIE Networks' flexibility products, following the implementation of the necessary updates to the Grid Code and other sources of obligations. The section also included updated text describing the interim operating arrangements currently in place between EirGrid and ESB Networks, under which distribution-connected flexible generation may be progressed at the request of the DSO, with actions implemented by the TSO and tagged as DSO Constraint actions. This content described detailed operational assumptions underpinning the development of the operating model and included interim arrangements for Physical Notifications and dispatch actions. It has been removed as this level of procedural and assumption-based detail is no longer required within the BMPS, following the update to reflect established and interim TSO-DSO operating arrangements in Section 3.4.3.
3.4.6 Prices and Volumes for Cross-Zonal Actions	The text in this section was updated to clarify the timing of the utilisation of Cross-Zonal Actions relative to the closure of the cross-zonal markets. The additional wording confirms that, with the exception of the setting down of Interconnector Net Transfer Capacities, any utilisation of Cross-Zonal Actions takes place after the closure of the cross-zonal markets. This clarification is added for transparency and to avoid ambiguity.
4. The Scheduling and Dispatch Process	In Section 4, the text stating that changes to be introduced as part of the Scheduling and Dispatch Programme are outlined in the BMPS was removed. This wording was deleted to reflect the key elements of the Scheduling and Dispatch Programme, including the Battery ESPS and Wind Dispatch Improvements initiatives, have been delivered in November 2025, and are therefore no longer prospective changes.

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4.2 Input Data Processing	In Section 4.2, the description of the treatment of Battery Energy Storage Power Station (ESPS) units was updated. This change reflected the delivery of Scheduling and Dispatch Programme enhancements which enable Battery ESPS units to be represented in market systems using a dedicated battery storage generator type, rather than the interim multi-fuel representation previously applied. The section was updated to reflect that Battery ESPS units may submit Physical Notifications and Commercial Offer Data across their full operating range, including both charging and discharging, and that, for the purposes of scheduling and dispatch, Battery ESPS units are scheduled using a follow-Physical Notification approach where practicable, subject to system security requirements.
4.4.5 Battery Energy Storage Power Station (ESPS) Units	In Section 4.4.5, text describing interim battery dispatch arrangements based on predefined scenarios and aggregate reserve thresholds was removed. This included references to battery dispatch being permitted only in specific circumstances (such as System Alert conditions, frequency restoration, merit-based real-time dispatch where energy did not need to be conserved, and constraints on state of charge), as well as references to minimum aggregate energy reserve thresholds and the evolving nature of the interim battery dispatch policy. This content was replaced with updated text describing the current scheduling and dispatch framework for Battery ESPS units following delivery of the Scheduling and Dispatch Programme. The revised section set out that Battery ESPS units are fully integrated into scheduling and dispatch processes, are modelled using submitted Physical Notifications across both positive and negative MW ranges and are scheduled under normal operating conditions using a follow-Physical Notification approach. The updated text also clarified the treatment of follow-PN within the optimisation process as a soft constraint, participation of batteries in reserve scheduling, SO flagging of dispatch actions, and the defined circumstances under which Battery ESPS units may be dispatched away from submitted Physical Notifications to maintain system security and operational integrity. Footnote 25 was updated to reference the latest published document describing the Scheduling and Dispatch Programme solution for Battery ESPS units.
5.2.1 Overview	In Section 5.2.1, footnote 28 was updated to reference the current Ireland's Electricity Sector Risk Preparedness Plan 2026-2029. In addition, explanatory text was added under Activation of Non-Market Generation (Defined in the Risk Preparedness Plan for Ireland) to reflect provisions set out in the updated Risk

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	Preparedness Plan. This included clarification that a market message will be issued whenever Temporary Emergency Generation (TEG) units are dispatched, and that where a unit is dispatched in response to a local forced outage involving critical safety or system concerns, a Margin Warning will not be issued.
5.2.2.1 Background	In Section 5.2.2.1, the original background text describing the publication of the Security of Electricity Supply Programme of Actions Information Paper by the CRU in September 2021, subsequent programme progress updates up to April 2024, and the conclusion of the programme in 2025 were replaced. The replaced text previously referenced the programme and associated updates through footnotes 28, 30 and 31. This has been updated to reflect the current Risk Preparedness context through footnotes 33, 34 and 35. These updated references include the Electricity Security of Supply - Programme of Work Update (April 2024) (footnote 33), the Security of Electricity Supply - Retention of Moneypoint Units (MP1, MP2 & MP3) document, reflecting the Services Agreement for the continued availability of the Moneypoint units (footnote 34), and the Ireland's Electricity Sector Risk Preparedness Plan 2026-2029 (footnote 35). The existing text confirming that Temporary Emergency Generation has been procured by EirGrid under the direction of the Commission for Regulation of Utilities, and that activation of these units is subject to Article 16(2) of Regulation (EU) 2019/941, remains unchanged.
5.2.2.2 Objectives	In Section 5.2.2.2, the Objectives section was updated such that the objective to "Secure the Ireland power system in line with the direction from the CRU" was brought forward and set out as Objective 1, while the same objective previously positioned lower in the list was removed. This change reflected the primacy of this objective within the Temporary Emergency Generation framework, with no change to the underlying intent.
5.2.2.3 Market Treatment	In Section 5.2.2.3, the previous narrative description of the market treatment of Temporary Emergency Generation (TEG) units was removed and replaced with a structured, principles-based framework. The removed text set out the market treatment of TEG units in a descriptive manner, covering non-participation in ex-ante markets, the capacity market and ancillary services, as well as detailed narrative explanations of their limited participation in the Balancing Market, bidding arrangements, pricing treatment, flagging of actions as non-energy, and settlement of payments and charges. This content was replaced with an explicit set of principles describing the treatment of TEG units across the Single Electricity Market. The updated section clearly delineated the treatment of

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	TEG units in ex-ante markets, the capacity market, the ancillary services market and the Balancing Market, reflecting their classification as non-market generation. The revised text explained the conditions under which TEG units may be made available for dispatch in the Balancing Market, clarifies their bidding and pricing treatment, the handling of infra-marginal rents, and confirms transparency measures through the reporting of TEG dispatch actions in Balancing Market reports.

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5.2.2.4 System Operations Treatment	In Section 5.2.2.4 Ireland, the System Operations Treatment for Temporary Emergency Generation (TEG) units was updated to clarify the interaction between system states, margin calculations, market transparency and dispatch actions. The previous text stating that a System Market Notice (Margin Warning) is issued when the system enters Alert or Emergency State in the absence of TEG capacity was removed. This has been replaced with updated wording clarifying that available TEG capacity is included in system margin calculations when assessing system state. Where the inclusion of TEG capacity is sufficient to address the shortfall, the system remains in Normal State, irrespective of whether the TEG units have been dispatched, reflecting their rapid ramping capability. Alert State or Emergency State is now defined as being issued only where the relevant criteria are met after TEG capacity has been included in margin calculations. In addition, the previous wording stating that the system remains in Normal State when market and non-market generation provide adequate margins was deleted and replaced with a clearer distinction between system state assessment and market transparency arrangements. The updated text confirmed that a Market Notice (system Margin Warning) is issued in real time when the system would otherwise have entered Alert or Emergency State in the absence of TEG capacity. The prior wording stating that TEG units are dispatched only after a Margin Warning has been issued, where time permits, was also removed and replaced with expanded text clarifying both the sequencing of dispatch and transparency obligations. The revised section confirmed that TEG units are dispatched once a Margin Warning has been issued where time permits, and where market-based measures alone are not sufficient to prevent further deterioration of the electricity supply situation, taking account of energy-limited resources. Where time does not permit, the updated text clarified that a Margin Warning will be issued as soon as practicable after dispatch. Finally, new text was added introducing explicit principles governing the prioritisation of individual TEG units for dispatch. This additional wording set out that dispatch priority will be guided by operational considerations and the nature of the prevailing system threat, including available run-hours, fuel type and operating costs, fuel logistics, ramping capability and risks to reliable operation.

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	Under the text “An Alert or Emergency State is issued by EirGrid when the relevant criteria are met with TEG included in margin calculations”, and within local security of supply and safety risks, the previous text describing the prioritisation of individual TEG site dispatch based on operational considerations was removed. That deleted text previously set out prioritisation criteria including available run-hours, operating cost (gas versus distillate), logistics associated with fuel replenishment, and ramp times. This was replaced with updated wording clarifying the circumstances under which non-market units may be dispatched outside the system-margin-driven process. The revised text introduced an explicit exception for situations where a safety risk or local security of supply risk arises that is unrelated to system margins. In such cases, the updated section confirms that non-market units may be dispatched without a Margin Warning having been issued, following consideration of available market measures and flexible demand. The new wording also clarified that a Market Notice will be issued as soon as practicable after dispatch, indicating the period for which the units have been dispatched. Under the Testing sub-heading in Section 5.2.2.4, new text was added to set out the circumstances under which Temporary Emergency Generation (TEG) units may be dispatched for testing purposes without a Margin Warning being issued. The added text clarified that TEG units may be tested from time to time either by the System Operator, to confirm availability and response times as part of operational testing, or by TEG operators, to ensure the operational readiness of the units. For operator-led testing, the updated section confirms that TEG units are required to submit a Physical Notification on the day to communicate expected generation levels during testing. The revised wording also explained that a Margin Warning is not issued during testing, as such warnings are intended to signal tight system conditions and require market participants to maximise availability, which would not be appropriate in a testing context. The section further clarified the associated transparency arrangements, confirming that a Market Notice will be issued immediately after a test has been initiated, as issuing a notice in advance would undermine the objective of the test. Under Reporting and transparency, the requirement to publish System Margin Outlook reports twice weekly showing the outlook with and without the capacity provided by TEG units was re-ordered. This item was moved from position 4 to position 1 within the list. This change brought the System Margin Outlook reporting requirement to the top of the section to reflect its primacy as the

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	principal transparency mechanism for communicating the impact of Temporary Emergency Generation on system margins. No change was made to the substance of the reporting requirement.
5.2.3.1 Background	In Section 5.2.3.1, background text describing the operation of the Moneypoint Units after the planned closure date of 30 June 2025 was updated. The previously stated forward-looking sentence was removed, as it had become out of date. This has been replaced with revised wording confirming that since their planned closure date on 30 June 2025, the Moneypoint Units only run when required for security of supply reasons and do not operate in the ex-ante markets. The updated text also clarifies that the units transitioned to non-market status on 1 July 2025, reflecting the current operational and regulatory position. Additionally, the wording describing operation of the Moneypoint Units on Heavy Fuel Oil (HFO) in paragraph 5 was also updated. The previously forward-looking statement describing the expected impact of HFO operation was removed and replaced with revised wording stated in the present tense. This change reflected that operation on HFO is now an established arrangement and confirms that operating on HFO increases the availability of the Moneypoint Units and reduces their carbon intensity compared to coal operation, while retaining fuel diversity on the island of Ireland. No change was made to the substance of the statement.
5.3 Audit	In Section 5.3, the reference to the independent assurance report was updated to reflect the most recent reporting period and publication date. The previous reference to the independent assurance report for 2023, published in 2024, was removed and replaced with updated wording confirming publication of the independent assurance report for 2024, published in 2026. The updated text references the Independent Assurance Report on compliance with specified elements of the Scheduling and Dispatch process for the 12-month period ended 31 December 2024, reflecting the latest available assurance position.
Appendix 1.1 Overview	In Appendix 1.1 (Overview) under European Legislation, references to EU electricity market legislation were updated to reflect most recent amendments. The existing reference to Directive (EU) 2019/944 on common rules for the internal market for electricity was updated to include Directive (EU) 2024/1711, reflecting amendments to the Directive. Similarly, the existing reference to Regulation (EU) 2019/943 on the internal market for electricity was updated to reference Regulation (EU) 2024/1747, reflecting amendments to that Regulation.

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	In addition, the reference to Commission Implementing Regulation No. 1348/2014 on data reporting under REMIT was removed and replaced with a reference to Commission Implementing Regulation (EU) 2026/256 on data reporting implementing Articles 7c(2), 8(1a), 8(2) and 8(6) of REMIT. This update reflects the replacement of the earlier Implementing Regulation with the current REMIT data reporting framework. Under Appendix 1.1 (Regulatory Decisions), the reference to SEM-24-073 - I-SEM Policy Parameters and Scheduling and Dispatch Parameters 2025 was removed and replaced with SEM-25-059 - I-SEM Policy Parameters and Scheduling and Dispatch Parameters 2026. This update reflects the publication of the most recent SEM Committee decision and ensures the appendix references the current applicable policy parameters
Appendix 1.2 Operational Security Obligations Framework	Under Appendix 1.2 - Operational Security Obligations Framework (European Legislation), the reference to Regulation (EU) 2019/943 on the internal market for electricity was updated to include “as amended by Regulation (EU) 2024/1747”. This change reflects the most recent amendment to the Regulation and ensures that the appendix references the current applicable legislative framework. Under Appendix 1.2 - Operational Security Obligations Framework (Regulatory Decisions), the reference to Electricity Crises: A Risk Preparedness Plan for Ireland (Revised Decision Paper: CRU202346) was removed and replaced with a reference to Ireland’s Electricity Sector Risk Preparedness Plan 2026-2029 (CRU2025240). This update is reflected in footnote 43 and ensures the appendix references the current applicable Risk Preparedness regulatory framework.
Appendix 1.3 Priority Dispatch Obligations Framework	Under Appendix 1.3 - Priority Dispatch Obligations Framework (European Legislation), the reference to Regulation (EU) 2019/943 on the internal market for electricity was updated to include “as amended by Regulation (EU) 2024/1747”. This change reflects the most recent amendment to the Regulation and ensures that the appendix references the current applicable legislative framework. Under Appendix 1.3 - Priority Dispatch Obligations Framework (Regulatory Decisions), the existing reference to Decision SEM-13-012 (Constraint Groups Arising from SEM-11-105) was retained, and additional related SEM Committee decisions were included. The appendix was updated to additionally reference Decision SEM-13-010 [2013], Decision SEM-13-010 [2013] (ii), and Decision SEM-13-010 (ii) Addendum [2025], ensuring the framework

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	reflects the full set of applicable and updated regulatory decisions relevant to priority dispatch obligations.
Appendix 1.4 Efficient Operation of the SEM Obligations Framework	Under Appendix 1.4 - Efficient Operation of the SEM Obligations Framework (European Legislation), the reference to Directive (EU) 2019/944 on the internal market in electricity was updated to Directive (EU) 2024/944. This change reflects the update to the electricity market Directive and ensures the appendix references the current applicable European legislative framework.
Appendix 1.5 Transparency obligations Framework	Under Appendix 1.5 - Transparency Obligations Framework (European Legislation), the reference to Commission Implementing Regulation (EU) No 1348/2014 on data reporting implementing Articles 8(2) and 8(6) of REMIT was removed and replaced with a reference to Commission Implementing Regulation (EU) 2026/256 on data reporting implementing Articles 7c(2), 8(1a), 8(2) and 8(6) of REMIT. This update reflects the replacement of the earlier REMIT data reporting Implementing Regulation with the current applicable regulatory framework.
Appendix 2.3 Dispatch and Control Actions	In Appendix 2.3 - Dispatch and Control Actions, the text describing the application of curtailment and constraint set-points was updated to clarify that control set-points are issued by the TSOs on a pro-rata basis with respect to unit output at the time of application, and that set-points may be reapportioned within a curtailment or constraint group when system conditions allow, based on real-time availability. In the description of Category 1 wind units, the wording was also updated to clarify that where a unit is not compliant with controllability requirements, the TSOs may open the circuit breaker or point of connection, reflecting operational discretion rather than a mandatory action.

Table 1: Summary of proposed revisions in BMPS version 9.1.

Following completion of the industry consultation process, SONI and EirGrid determined that additional changes should be made beyond those outlined in Table 1 above. These changes are explained in the next section.

Industry Representations

This section summarises the representations received during the consultation. Table 2 provides a summary of the representations received during the external BMPS consultation and the TSOs' responses to those representations.

Table 2: Summary of representations received during the external BMPS consultation

Section / Topic	Summary of Representation(s) Received	TSO Response
Section 5.2.2.4 Temporary Emergency Generation (TEG) - System Operations Treatment	One respondent requested that the BMPS state more clearly that TEG dispatch under these provisions is a measure of last resort, used only once the market-based and operational measures within the RPP escalation framework have been exhausted.	Measure of last resort: This remains a measure of last resort when addressing local conditions on an exceptional basis (once market options have been exhausted). An explicit reference to this as a measure of last resort is added to version 9.2 of the BMPS.
Section 4.4.5 Battery Energy Storage Power Station (ESPS) Units	Two respondents requested that the BMPS be updated to explicitly reflect the Mod_02_24 principle that, where a unit's Physical Notifications become infeasible as a result of an earlier TSO action, the TSO will continue to dispatch the unit away from those infeasible PNs, with settlement based on EDIL availability. One of these respondents raised this point across seven separate submissions covering different aspects of the same underlying request, making eight submissions on this topic in total. This was raised as an important risk mitigation for battery storage operators that is not currently explicit in Section 4.4.5.	The Mod_02_24 content referenced is captured in the Overview of SDP Solution for Battery Units V2. However, to ensure clarity and consistency within the BMPS version 9.2, the wording in Section 4.4.5 - Battery Energy Storage Power Station (ESPS) Units is updated to explicitly include: "Where Physical Notifications (PNs) become infeasible as a result of a prior TSO action within the Trading Day, the TSO shall dispatch the unit to 0 MW once the unit has reached its Operational Minimum/Maximum Storage Quantity (i.e. away from the infeasible PN). In such circumstances, no re-declaration by the participant is required."
General Consultation Process	One respondent queried why this consultation had not been published on EirGrid's consultation portal, as is the case for other consultations, and requested that future BMPS consultations be included on that portal.	This is noted. Future BMPS consultations will also be published on the EirGrid consultation portal, alongside the existing approach. The SONI portal was used for this consultation, therefore no changes to our process are required in Northern Ireland.

Section / Topic	Summary of Representation(s) Received	TSO Response
Section 5.2.2 / 5.2.2.4 Temporary Emergency Generation (TEG) - System Operations Treatment	Three respondents sought clarification on how the proposed amendment, permitting dispatch of non-market generation without a Margin Warning, aligns with the framework set out in the CRU's Risk Preparedness Plan (RPP), including the relevant system state criteria and the definition of Emergency State under the BMPS.	Regulatory Framework: The proposed amendment aligns with the following sections of the <u>Risk Preparedness Plan</u>, published by the CRU in January 2026: - Table 11 - System state criteria and a summary of key actions and measures to be deployed (p.112): “In exceptional conditions, where a safety or local security of supply risk arises (unrelated to system margins), non-market units may be dispatched without a Margin Warning issued. In this case, a market notice will be issued as soon as is practicable, indicating the period for which the units have been dispatched.” - Operational treatment (p.150): Outages: TEG capacity is not included in margin calculations for the purpose of scheduling planned outages. TEG capacity may be considered as a risk measure in the event of local system outages with critical safety / system conditions. The units may be dispatched should a forced outage with critical safety / system concerns occur. If dispatched under these conditions, the System Operator will issue a market notice that the units have been dispatched (a Margin Warning will not be issued).
Section 5.2.2 Temporary Emergency Generation (TEG) - Regulatory Basis (Article 16(2))	One respondent noted that TEG is provided for within the RPP as a non-market mechanism under Article 16(2) of Regulation (EU) 2019/941, under which non-market measures should only be activated as a last resort where market-based measures have been exhausted or are demonstrably insufficient, and that the Regulation places importance on transparency and stakeholder awareness when such measures are applied.	The activation of TEG units remains a last resort where local measures have been exhausted and would be insufficient to prevent a deterioration in electricity supply.

Section / Topic	Summary of Representation(s) Received	TSO Response
Section 5.2.2.3 / 5.2.2.4 Temporary Emergency Generation (TEG) - Market Treatment and System Operations Treatment	Three respondents raised concerns around transparency where TEG or REU is dispatched without a Margin Warning, including the risk that this could mask local adequacy issues, reduce visibility of non-market generation use, and sit against the stakeholder-awareness expectations in Article 16(2) of Regulation (EU) 2019/941. One of these respondents raised this point twice, once as a general transparency concern and once specifically regarding local security of supply and safety risks; both are addressed by the same response below.	Transparency: Additional transparency measures have been introduced. These now include: • System Margin Outlook (link) - expanded to include both TEG and REU availability. • Issuing notice of a Margin Shortfall Risk (ON) when an REU unit has been requested to prepare for synchronisation (one occasion from 22/11/2025 to 25/11/2025) • Issuing Margin Warnings in real time. • Issuing TEG Dispatch communications when TEG units are dispatched to address security concerns. Non-market generation 3-month report (link) - on Margin Warnings, Margin Outlook Dispatch, and REU
Section 5.2.2.4 Temporary Emergency Generation (TEG) - System Operations Treatment	One respondent requested clarification of the rationale for permitting TEG/REU dispatch without a prior Margin Warning in cases of local safety or security of supply risk.	Rationale: Provision for this is made for in the Risk Preparedness Plan. The rationale for not issuing a Margin Warning is: 1. The nature of the local system need - as a last resort before the disconnection of customer load (i.e. related to safety / security and unrelated to system margins). 2. A Margin Warning would be potentially confusing to market participants when system margins could be very healthy. 3. While a Margin Warning is not issued, transparency is assured by the requirement in the RPP that a market notice be issued when a unit has been dispatched.
Section 5.2.2.3 Temporary Emergency Generation (TEG) - Market Treatment	One respondent queried the distinction between “activation” and “dispatch” wording used in relation to BM reporting of TEG units, and separately requested confirmation that all TEG/REU use, including for testing, is captured in BM reporting.	Dispatch Instructions (DIs) are issued to TEG units for testing. No unit is allowed to unilaterally increase or decrease their output without having been instructed to do so by NC. DIs are included in BM Reporting (see Appendix 2.1 Input Data Processing of the BMPS).

Section / Topic	Summary of Representation(s) Received	TSO Response
		A market message is further issued if a TSO-initiated test is undertaken (testing by operators requires a PN).
Section 5.2.2.4 Temporary Emergency Generation (TEG) - System Operations Treatment	One respondent requested further clarity on the new “Testing by TEG operators” procedure, including how such testing is initiated and assessed, and raised concern that unnecessary testing-related dispatch could distort the wholesale market. And also requested clarity on the TSOs’ testing policy for both market and non-market generation and disputed the BMPS statement that TEG/REU testing follows the same process as other thermal units not regularly dispatched via the balancing market, on the basis that no such process for market-based generation exists elsewhere in the BMPS.	The purpose of the BMPS is to set out, in a clear and accessible manner, how the TSOs undertake scheduling and dispatch in real time. It is not intended to define detailed testing arrangements or processes, which are addressed through separate mechanisms and documentation.
Section 3.1.1 Priority Dispatch	One respondent requested further discussion with the System Operators on the Priority Dispatch Order set out in SEM-11-062, in the context of increasing levels of interconnection and its wider market impacts.	This matter is being considered under a separate, dedicated workstream and falls outside the scope of the BMPS Version 9.1 consultation.
Section 5.2.2.4 Temporary Emergency Generation (TEG) - System Operations Treatment	One respondent raised concern over the provision that, where time does not permit, a Margin Warning will be issued as soon as practicable after TEG units have been dispatched, rather than beforehand as under current practice, and the implications this has for market transparency.	This provision is to allow for (exceptional) cases in which system conditions are rapidly deteriorating, and where a real-time response is necessary to secure the system.

Section / Topic	Summary of Representation(s) Received	TSO Response
Section 5.2.2.4 / 5.2.3.4 Temporary Emergency Generation (TEG) - System Operations Treatment / Dispatch Priority	One respondent raised concern that including available run-hours as a factor in TEG/REU dispatch prioritisation amounts to more favourable treatment than market-based generation receives and requested either removal of the factor or an equivalent policy for market generation.	The reference to available run-hours relates to the prioritisation between TEG and REU units within the non-market fleet. It does not alter the established approach to the dispatch of market units that are declared available, and which continue to be utilised in accordance with the Balancing Market framework. The inclusion of this consideration is intended to support the efficient use of out-of-market resources in the context of maintaining security of supply (considering both margin shortfalls that can be foreseen as well as those that might come about rapidly on the day when there is no time to call on REU units).

Publication of a Revised BMPS

As per Condition 10B and 22B of EirGrid and SONI's Transmission System Operator Licenses respectively, if necessary, we will update the BMPS following the review of the Consultation Report by the Utility Regulator and the Commission for Regulation of Utilities.

The BMPS is hosted on both EirGrid and SONI websites, as well as the 'TSO Responsibilities' page of www.SEM-O.com. Alongside it, are published operational processes and methodologies which provide more information on specific aspects of scheduling and dispatch. These process and methodology documents are subject to change without consultation.

Appendix: Development and Maintenance of the BMPS

During the I-SEM project the SEM Committee highlighted the need for transparency and predictability of TSO actions in the Balancing Market. The purpose of the BMPS is to provide clarity and certainty to market participants on the timing and nature of TSO actions and to describe how exceptional actions will be reported.

In its 2015 decision on the energy trading arrangements in I-SEM, the SEM Committee (SEMC) supported the development of a Balancing Market Principles Statement (BMPS) by the TSOs to ensure consistency, transparency and comprehensibility of TSO decision making in the Balancing Market. Following an initial consultation with the I-SEM market rules working group, the SEMC consulted publicly on the Terms of Reference for the BMPS before publishing the approved terms in October 2016.

In December 2016, both Regulatory Authorities consulted on modifications to SONI and EirGrid's TSO Licences to incorporate a requirement on both TSOs (in conjunction) to develop and maintain the BMPS in line with the Terms of Reference determined by the SEMC. The decision on the modifications was published in March 2017.

Table 4: Key milestones in the development and maintenance of the Balancing Market Principles Statement.

Document	Reference / Date
SEM Committee Decision on Energy Trading Arrangements, Detailed Design	SEM-15-065, 11 th September 2015
SEM Committee Decision on Balancing Market Principles Statement Terms of Reference	SEM-16-058, 7 th October 2016
Revised SONI Transmission System Operator Licence	Condition 22B, March 2017
Revised EirGrid Transmission System Operator Licence	Condition 10B, March 2017
BMPS First Consultation Version	7 th April 2017
BMPS First Consultation Responses	8 th September 2017
BMPS First Approved Version 1.0	8 th September 2017
BMPS Revised Version 1.1 for Consultation	6 th March 2018
BMPS Approved Version 2.0	11 th April 2018

Document	Reference / Date
BMPS Revised Version 2.1 for Consultation	10 th January 2019
BMPS Approved Version 3.0	14 th June 2019
BMPS Revised Version 3.1 for Consultation	23 rd July 2020
BMPS Approved Version 4.0	14 th October 2020
BMPS Revised Version 4.1 for Consultation	26 th February 2021
BMPS Approved Version 5.0	28 th April 2021
BMPS Revised Version 5.1 for Consultation	12 th April 2022
BMPS Approved Version 6.0	29 th July 2022
BMPS Revised Version 6.1 for Consultation	24 th April 2023
BMPS Approved Version 7.0	27 th June 2023
BMPS Revised Version 7.1 for Consultation	20 th of May 2024
BMPS Approved Version 8.0	29 th of July 2024
BMPS Revised Version 8.1 for Consultation	13 th of May 2025
BMPS Approved Version 9.0	12 th August 2025
BMPS Revised Version 9.1 for Consultation	14 th June 2026
BMPS Approved Version 10.0	25 th August 2026

The obligations of Condition 22B and 10B of our licences require us to ensure the BMPS is as accurate as possible. The BMPS will be reviewed on an ongoing basis and any revisions that are required will be consulted on with market participants. We must also engage with the Regulatory Authorities on proposed revisions to the BMPS and submit to them the revised version before publication.