

Single Electricity Market

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| Modifications Committee Meeting MinutesMeeting 51europa hotel,08 october 2013 10:30 – 13:00 |

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Document History

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| --- | --- | --- | --- |
| **Version** | **Date** | **Author** | **Comment** |
| 1.0 | 15 October 2013 | Modifications Committee Secretariat | Issued to Modifications Committee for review and approval |
| 2.0 | 23 October 2013 | Modifications Committee Secretariat | Review of content by Modifications Committee complete, published track changed version on SEMO website and notified Market Participants. |

Distribution List

|  |  |
| --- | --- |
| **Name** | **Organisation** |
| Modifications Committee Members | SEM Modifications Committee |
| Modification Committee Observers | Attendees other than Modifications Panel in attendance at Meeting |
| Interested Parties | Modifications & Market Rules registered contacts |

Reference Documents

|  |
| --- |
| **Document Name** |
| [Trading and Settlement Code](http://semopub/MarketDevelopment/MarketRules/TSC.docx) and Agreed Procedures: Version 13.0 |
| [Mod\_11\_12 Proposal to extend the definition of Special Units to include Compressed Air Energy Storage](http://semopub/MarketDevelopment/ModificationDocuments/Mod_11_12%20Gaelectric.docx)  |
| [Mod\_25\_12 Suspension of Interconnector Unit on instruction of Interconnector Owner due to breach of Access Rules](http://semopub/MarketDevelopment/ModificationDocuments/Mod_25_12%20Suspension%20of%20IUs.docx) |
| [Mod\_02\_13 Registration of Charges](http://semopub/MarketDevelopment/ModificationDocuments/Mod_02_13%20Registration%20of%20Charges%20Submitted.doc) |
| [Mod\_09\_13 Amendment of AP7 to include the use of e-mail notification and the SEMO public website in the event of a GSF\_v2](http://semopub/MarketDevelopment/ModificationDocuments/Mod_09_13_v2.docx) |
| [Mod\_10\_13 Removal of Requirement for SOs to send certain Dispatch Instruction Codes and Instruction Combination Codes for Pumped Storage Units to the MO](http://semopub/MarketDevelopment/ModificationDocuments/Mod_10_13%20Dispatch%20Instructions%20for%20Pumped%20Storage%20Units_v0%202.docx) |
| [Mod\_10\_13 Slides](http://semopub/MarketDevelopment/ModificationDocuments/Mod_10_13%20Dispatch%20Instructions%20for%20Pumped%20Storage%20Units_v0%202.docx) |
| [CMS Slides](http://semopub/Publications/General/CMS%20Update%20Meeting%2051.pptx) |
| [REMIT Slides](http://semopub/Publications/General/REMIT%20Mods%20Panel%20Presentation%20Meeting%2051.pptx) |

In Attendance

|  |  |  |
| --- | --- | --- |
| **Name** | **Company** | **Position** |
| **Modifications Committee** |
| Aine Dorran | ESB | Generator Alternate |
| Brian Mongan  | AES | Generator Alternate  |
| Clive Bowers | CER | RA Member |
| Connor Powell | Airtricity | Supplier Alternate |
| Denis Kelly | NIE T&D | MDP Member |
| Elaine Gallagher | CER | RA Alternate |
| Emma Connolly | SONI | SO Alternate |
| James Long | ESB Networks  | MDP Alternate |
| Jill Murray | Bord Gáis | Supplier Member |
| Kevin Hannafin | Viridian Power & Energy | Generator Member |
| Kris Kennedy | SONI | SO Member |
| Mary Doorly | IWEA | Generator Member |
| Michael Preston | EirGrid | SO Member |
| Natalie McCurry | UREGNI | RA Alternate |
| Niamh Delaney | SEMO | MO Member |
| Patrick Liddy | Activation Energy | DSU Member |
| Philip Carson | Power NI | Supplier Alternate |
| William Steele | Power NI | Supplier Member |
| **Secretariat** |
| Aisling O'Donnell | SEMO | Secretariat |
| Sherine King | SEMO | Secretariat |
| **Observers** |
| Alison Wilson | Power NI | Observer |
| Brian Kennedy | Gaelectric | Observer |
| Brían McAuley | SEMO | Observer |
| Gary McCullough | SONI | Observer |
| Juliet Corbett | DETI | Observer |
| Karen Shiels | UREGNI | Observer |
| Paul McGuckin | Mutual Energy | Observer |
| Robert Flanagan | SEMO | Observer |
| Sinead O’ Hare | Power NI | Observer |
| Siobhan McHugh | EirGrid | Observer |

# SEMO Update

The Minutes from Meeting 50 were read and approved. The final approved version of the Minutes is now published on the SEMO website.

Secretariat advised that Iain Wright and Jill Murray were successful in retaining their Chair and Vice-Chair positions respectively.

Secretariat presented the programme of work.

Secretariat provided an overview on the status of the 2012 market audit issue amendments advising that the final outstanding issue will be addressed by Meeting 52.

MO Member presented slides in relation to the CMS update advising that the release cut-off date of September 27th 2013 for the April 2014 CMS release has passed. MO Member advised that there are no approved Modification Proposals for SEM 2.3.0, however a number of CRs will be included for implementation. The proposed deployment date for the release is 15th November 2013.

# Review of Actions

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| Actions Recorded At meeting 50 |
| Mod\_11\_12 Definition of Special Units | * TSO to procure IA-In progress
 |
| Mod\_25\_12: Suspension of interconnector unit on instruction of interconnector owner due to breach of access rules | * Proposer to monitor the issue and revert to Committee in six months-Closed: No data to assess as auctions have not been congested. See deferred section for further detail.
 |
| Mod\_02\_13: Registration of Charges | * SEMO to continue to pursue Participants in relation to signing the Deeds of Charge-In Progress
 |
| * SEMO to submit alternative version of proposal for consideration at Meeting 51- In Progress. Proposal will be submitted for consideration at Meeting 52.
 |
| Mod\_09\_13: Amendment of AP7 to include the use of e-mail notification and the SEMO public website in the event of a GSF | * SEMO to submit alternative version of proposal for consideration at Meeting 51-Closed.Alternative version submitted for Meeting 51.
 |

# Deferred Modification Proposals

## [Mod\_11\_12](http://semopub/MarketDevelopment/ModificationDocuments/Mod_08_12%20MIUNs.docx) proposal to extend the definition of special units to include caes

Proposer: Gaelectric

SO Member advised that the RCUC IA is progressing and discussions are being held with ABB, however it may take another 2-3 weeks for the full scope to be agreed. RA Alternate queried in relation to the below action which was recorded at Meeting 47:

* RAs to request TSO to discuss proposal with Grid Code

Secretariat advised that the action had been closed at a previous Meeting however discussion of the proposal will take place at the Grid Code following procurement of the RCUC IA.

Actions

* Secretariat to request extension until March 2014.

Decision

* The proposal was deferred.

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| **Deferred**  |

## II. [Mod\_25\_12](http://semopub/MarketDevelopment/ModificationDocuments/Mod_08_12%20MIUNs.docx) Suspension of interconnector unit on instruction of interconnector owner due to breach of access rules

Proposer: EirGrid

Secretariat provided an update advising that as the auctions have not been congested to date, there is no data to assess. Secretariat advised that the proposer does not believe the modification will need to be implemented in the next 6 -12 months as the risk levels appear very low at present. Secretariat further advised that due to the above information, the proposer suggested withdrawal of the proposal. The Committee were in unanimous agreement for the proposal to be withdrawn.

Actions

* N/A

Decision

* The proposal was withdrawn

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| **Withdrawn** |

## [Mod\_02\_13](http://semopub/MarketDevelopment/ModificationDocuments/Mod_08_12%20MIUNs.docx) registration of charges

*Proposer: EirGrid*

MO Member advised that the Modifications Committee legal advisors are currently re-drafting the Modification Proposal and carrying out a legal review. MO Member advised that the proposal will be submitted for consideration at Meeting 52. Chair queried as to whether the updated version of the proposal will be circulated to the Modifications Committee. MO Member advised that upon completion of the final version, the proposal will be circulated to the Committee two weeks prior to the next Modifications Committee Meeting, in keeping with the standard procedure for Modification Proposals. As specialist legal advice is being obtained in developing the drafting, SEMO does not foresee further editing the legal drafting of the proposal following receipt from the legal advisors.

Actions

* Alternative version to be submitted for Meeting 52

Decision

* Deferred

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| **Deferred**  |

## II. Mod\_09\_13 Amendment of AP7 to include the use of e-mail notification and the SEMO public website in the event of a GSF

*Proposer: EirGrid*

MO Member presented the proposal advising that it was previously considered at Meeting 50 however additional amendments were necessary to Sections 2.21 and 2.22 of AP7. MO Member advised that the appropriate amendments have been made to the proposal.

The issue was highlighted by the market audit and it is proposed to amend AP7 to include the use of the SEMO public website and market message e-mail alerts to supplement the current emergency communication methods. The methods set out in AP7 are fax and telephony based. The use of fax and telephone calls in practice does not lend itself to efficient communication with affected parties in the event of a General Systems Failure (GSF), whereas using the SEMO public website and e-mail alerts is instant and is the established participant communication method. MO Member further advised that the proposal seeks to remove the need to send the emergency communication and transaction notification forms in the event of a GSF, which will result in a more expeditious process. MO Member noted these forms will remain to be utilised in the event of a General Communications Failure (GCF).

MO Member stated that this proposal proposed amendments to AP7 to reflect actual current practice during a GSF.

MO Member advised that the MDP Member had raised a query previously in relation to e-fax.

MO Member advised that an additional section has been added to the proposal to clarify the use of e-fax. The e-fax application takes inbound faxes, converts them to e-mail and then sends them directly to an e-mail address or a distribution list. It also converts all received faxes to PDFs and stores them in a local directory

Generator Alternate queried as to the email database that will be used to support the email alerts as the distribution lists are not always fully up to date. MO Member advised that the distribution lists are maintained by SEMO IT and that the proposal is not modifying the current process in so far as sending market messages to the relevant distribution lists.

Generator Alternate reiterated concern in relation the database of distribution lists not being updated efficiently. Supplier Member advised that users can be registered through the Type 2 channel and through the Market Alerts on the SEMO website and advised this may be causing some confusion for new users. MO Member confirmed this concern would be discussed with SEMO IT.

Chair queried as to whether Market Messages would be issued upon utilisation of the SEMO public website. MO Member confirmed market messages would be used.

Actions

* SEMO to ensure all newly registered users are added to the relevant Market Message distribution lists and that all lists are up to date
* SEMO IT to issue a clarification between Type 2 lists and Market Alert distribution lists

Decision

* Recommended for Approval

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| **Recommended for Approval by Unanimous Vote (subject to feedback on actions)** |
| Áine Dorran | Generator Alternate | Approved |
| Brian Mongan | Generator Alternate | Approved |
| Connor Powell | Supplier Alternate | Approved |
| Denis Kelly | MDP Member | Approved |
| James Long | MDP Alternate | Approved |
| Jill Murray-Chair | Supplier Member | Approved |
| Kevin Hannafin | Generator Alternate | Approved |
| Kris Kennedy | SO Member | Approved |
| Mary Doorly | Generator Alternate | Approved |
| Michael Preston | SO Member | Approved |
| Niamh Delaney | MO Member | Approved |
| Patrick Liddy | DSU Member | Approved |
| William Steele | Supplier Member | Approved |

# New Modification Proposals

## I. [Mod\_10\_13](http://semopub/MarketDevelopment/ModificationDocuments/Mod_08_12%20MIUNs.docx) [Removal of Requirement for SOs to send certain Dispatch Instruction Codes and Instruction Combination Codes for Pumped Storage Units to the MO](http://semopub/MarketDevelopment/ModificationDocuments/Mod_10_13%20Dispatch%20Instructions%20for%20Pumped%20Storage%20Units_v0%202.docx)

*Proposer: EirGrid*

Proposer presented slides on proposal advising that the modification proposes to no longer send certain Dispatch Instruction and Instruction Combination Codes, which are used to differentiate between the different modes of operation of Pumped Storage units. These particular instructions are not required by the Instruction Profiler (IP) to profile the instructions into Dispatch Quantities in SEM, however it has been observed that they can cause an issue in the validation process. Therefore, the SOs propose that they are no longer sent to the Market Operator. Proposer advisedthat confirmation has been received from the vendor indicating that there is no impact on instruction profiling if the instructions are removed.

Proposer stated that there will be no change required to the MO or SO systems should the proposal be implemented and that Pumped Storage Units will still receive the same instructions as always via EDIL. However there will be a process change in the TSOs preparation of Dispatch Instruction Data feeds.

Generator Alternate sought clarification in relation to the issue identified in the validation process which led to the proposal being raised. Proposer advised that even though the particular unit was unavailable following a failure to synchronise, a dispatch quantity was profiled, and it appeared as though the unit had not responded to its dispatch instruction.

MO Member advised that the IP is functioning as specified and that there is no defect within the IP.

Chair queried as to why the instructions were the reason for the anomaly. Proposer advised that a particular sequence of events led to a FAIL instruction not being validated. Proposer further advised that based on testing of different means of sending the Dispatch Instructions in question carried out in a test environment, the change proposed in the modification is the simplest solution to avoid the particular issue recurring.

MO Member advised that there is currently some filtering of the Dispatch Instructions carried out.

Generator Alternate queried as to whether the instructions are used elsewhere in the SEMO systems. Proposer advised that they are not.

Generator Alternate queried as to whether this issue could arise subsequently.

Proposer stated that a unique combination of events had lead to this issue being discovered. The SOs and MO are confident that removing the requirement to send the Dispatch Instructions and Instruction Combination Codes in this Modification Proposal will ensure that this issue does not recur.

Actions

* N/A

Decision

* The proposal was Recommended for Approval

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| **Recommended for Approval by Unanimous Vote**  |
| Áine Dorran | Generator Alternate | Approved |
| Brian Mongan | Generator Alternate | Approved |
| Connor Powell | Supplier Alternate | Approved |
| Kevin Hannafin | Generator Alternate | Approved |
| Mary Doorly | Generator Alternate | Approved |
| Patrick Liddy | DSU Member | Approved |
| William Steele | Supplier Member | Approved |

## AOB/Upcoming Events

1. FRR\_21\_12 Amendment to the Available Transfer Capacity Definition

Discussion took place with regard to the RA decision letter for FRR\_21\_12 Amendment to Available Transfer Capacity (ATC) definition. Secretariat provided a background to the proposal advising that the proposal has been active since September 2012. Secretariat further advised that an alternative version of the proposal was requested by the Committee and this version was Recommended for Approval by majority vote at Extraordinary Meeting 45, with one dissenting view included in the original FRR. The proposal was issued to the RAs for final decision in November 2012, with a decision of Further Work Required received in August 2013.

Secretariat provided an overview on the areas of the FRR which the RAs had requested further information on:

* The underlying rationale for the proposal
* The risks of not implementing the proposal and the alternatives that were considered
* The commercial effects of any curtailment of IC flows
* Discrimination introduced in the proposal against IC Users and IC Owners

Secretariat advised that the TSO updated the FRR which was re-circulated to the Committee for comment. Comments were received from Mutual Energy, Airtricity, and Viridan.

Secretariat advised that at Meeting 50 it was decided that as the proposal had previously been Recommended for Approval by the Modifications Committee, there is no provision in the T&SC to allow for another vote once the proposal has been issued to the RAs for final decision. And that in order for another vote, it would be necessary for the RAs to reject the proposal and that the TSO would have to raise a subsequent proposal for consideration by the Modifications panel. However upon reflection of the Code, the Secretariat advised that there appears to be no evidence of a clause in the Code which precludes a further vote and that further work required could either be work on the FRR or on the proposal itself.

Chair commented that there appeared to be some discontent with the updated FRR.

Proposer advised that curtailment, versus an ATC reduction prior to the EA1 gate, are two separate issues. Proposer commented that there seemed to be confusion in relation to curtailment, which takes place, for security purposes, after a market flow is established, versus an ATC reduction prior to the EA1 Gate, before any market flow is scheduled. Proposer suggested that the TSO can either provide further clarity on the updated FRR or an alternative version of the proposal could be submitted for consideration.

Chair stated that there is a clear distinction between curtailment and addressing the ATC however expressed the view that the updated FRR may be confusing.

Observer commented that ATC should not be reduced as a first measure as this is not in line with EU Regulation No. 714/2009. Proposer stated that EU Regulation No. 714/2009 allows for ATC reduction for system security reasons and that none of the counter measures available to the TSO are firm. In addition, a reduction in flow without an ATC change would result in an error being placed in both the SEM error account and the GB market error account.

Chair queried as to whether any of the parties who commented on the updated FRR are aware of an alternative or another option that would suitably address the issue.

Chair queried that as the SEM is unconstrained, why is the IC treated differently to Generator units.

Proposer advised that the IC trades are subject to EU regulation No 714/2009 and involve both GB andSEM markets ,necessitating that two market trades are coordinated.

DSU Member queried as to whether there is a scenario where GB could reduce the ATC. Proposer advised that GB could reduce the ATC and would not reduce the flow without advising the SOs.

Observer expressed concern that if the flow is stopped, it would be the IC Owner who would ultimately bear the cost and that there appears to be no compensation from the SO to the IC owner. Proposer advised it is the SO expectation that the IC Owner could be compensated for capacity as indicated in the regulation, this requires consideration by the TSO and the IC owners ..

Proposer further advised that this scenario will be highly rare in occurrence and that the SO would try to avoid this scenario from happening where possible.

Supplier Member advised that not taking the Modification Proposal into account, there are two conflicting documents on the issue in existence. Supplier Member further advised that this proposal has been debated at a number of Meetings and that all comments should either be reflected within Section 8 of the FRR, or that an alternative version of the proposal should be raised.

Chair summarised that the main issue from an IC Owner perspective appears to centre around the issue that there is no decision as to which party will be responsible for payment upon stopping the flow on the IC. Chair suggested that analysis be carried out to demonstrate the implications of not implementing the proposal and to decide what is the most cost effective from a market point of view.

Observer suggested that the proposal be included as part of the new design for 2016. Proposer advised that the SO will not allow themselves to be in a position of operating a system that is not secure and that it is prudent to have the ability to correct a foreseeable condition.

Chair advised that if the Committee are unable to reach a consensus on how best to proceed that the FRR must be re-submitted to the RAs for final decision.

Generator Alternate expressed concern that the commercial issues being discussed are not relevant to the market. Proposer advised that currently the SO would be in breach of the Code, stressing that the SOs cannot continue to remain in this position.

Secretariat suggested that any further views from the Committee are issued as dissenting views for inclusion in the updated FRR, as opposed to comments, with the FRR being re-submitted to the RAs. Chair reiterated the possibility of raising an alternative version.

RA Member commented that within the Code, there does not appear to be a clause which precludes a re-vote of a proposal that has previously been Recommended for Approval by the Modifications Committee.

MO Member expressed concern in relation to a re-vote on the same legal drafting, advising that ideally the Committee should be voting on an alternative version of the proposal, so as not to undermine the previous vote.

Generator Alternate advised that there has been no further work on the legal drafting itself; only further clarifications.

NIAUR Alternate queried as to whether changing the justification of the FRR undermines the Modification Proposal itself.

Chair commented that it is an unfavourable precedent to set by re-voting on legal drafting that is fundamentally unchanged. DSU Member expressed the view that it is incorrect that the possibility of re-voting on a previously approved proposal is not a viable option.

Chair suggested that the Committee agree on the principal that a proposal that has previously been voted on, cannot be re-voted on, if there are no changes to the legal drafting of the proposal. DSU Member was not agreeable to this, therefore this principal was not approved. However, there was Committee consensus that no party was looking for a re-vote on the proposal at the Meeting.

Actions

* Participants to submit dissenting views for inclusion in the FRR within a 2 week timeline i.e. by Tuesday 23 October
* Any alternative versions of the proposal must also be raised within the 2 week timeline

2. The Regulation on wholesale Market Integrity and Transparency (REMIT)

MO Member presented slides summarising the structure of REMIT and what it entails.

MO Member advised that REMIT centres around the prohibition of insider trading and market manipulation and that there is some degree of overlap between REMIT and the Transparency Regulation.

MO Member inquired as to the Committee’s views on next steps in relation to REMIT. MO Member sought Committee views in relation to Participants reporting through a central platform, or independently reporting.

MO Member advised that the timescale of implementation remains ambiguous; further advising of awaiting issue of the Implementing Acts.

Chair summarised that the 2 main elements in reporting under REMIT centre around insider information and the wider data energy related trades. Chair advised that SEMO does not have access to all of the trade information on energy related trades that will need to be reported on. Chair further advised of the difficulty for the Committee to provide feedback at this time as they do not have all the relevant information.

Chair queried as to whether under REMIT SEMO will be obliged to report bids that are manipulative or suspicious. MO Member advised that under Article 15 there is a requirement to report evidence of market manipulation. MO Member further advised that SEMO does not currently have a market monitoring function however the many energy exchanges do have this function in place.

Chair queried as to whether discussion on EMIR had occurred to date. MO Member advised that it had and that the ACER recommendation advises harmonising the data fields to be reported under REMIT, with the data fields to be reported under EMIR as much as possible.

Actions

* Committee to consider REMIT reporting mechanism in advance of Meeting 52

Calendar updates

* 21st November 2013 - Mod Proposal submission deadline
* 5th December 2013 - Mods Meeting 52 Dublin

# Appendices

## Appendix 1 - Secretariat Programme of Work

|  |
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| **Status as at 08 October 2013** |
| **FRRs ‘Recommended for Approval’ without systems impacts awaiting RA Decision** |
| **Title** | **Sections Modified** | **Sent** |
| Mod\_18\_11 Definition of ‘Availability’ | T&SC Glossary | 08 September 2011 |
| **RA Decision ‘Further Work Required’** |
| Mod\_21\_12 Amendment to Available Transfer Capacity (ATC) definition | T&SC Section 5; T&SC Appendix K  | 21 November 2012 |
| **RA Decision Approved Modifications with System Impacts** |
| **Title** | **Sections Modified** | **Effective Date** |
| N/A | N/A | N/A |
| **RA Decision Approved Modifications without System Impacts** |
| Mod\_05\_13 Definition of Working Day | T&SC Glossary | 17 July 2013 |
| Mod\_07\_13 Clarification regarding the rules for Instruction Profiling in Appendix O | Appendix O | 17th July 2013 |
| **AP Notifications** |
| Mod\_06\_13 Housekeeping 6 | AP1, AP6 | 28 June 2013 |
| Mod\_08\_13 Amendment to number of days granted to the MO for the issuing of Party Accession Deeds | AP1 | 28th Jun 2013 |
| **Modification Proposal Extensions** |
| Mod\_11\_12 Proposal to extend definition of Special Units to include Compressed Air Energy Storage | Extension Granted | 18 October 2013  |
| Mod\_25\_12 Suspension of Interconnector Unit on instruction of Interconnector Owner due to breach of Access Rules | Extension Granted | 31 January 2014 |
| **CMS cut-off date** |
| April 2014 CMS Release | RA Decision Approved Mods only | 27 September 2013 |