

MODIFICATION PROPOSAL FORM			
Proposer (Company)	Date of receipt (assigned by Secretariat)	Type of Proposal (delete as appropriate)	Modification Proposal ID (assigned by Secretariat)
SEMO	18th November 2021	Standard	Mod_20_21
Contact Details for Modification Proposal Originator			
Name	Telephone number	Email address	
Katia Compagnoni		balancingmodifications@semo.com	
Modification Proposal Title			
Undo instructions – scenario 2			
Documents affected (delete as appropriate)	Section(s) Affected	Version number of T&SC or AP used in Drafting	
Appendices Part B	Appendix O.14 table 2	V24	
Explanation of Proposed Change (mandatory by originator)			
<p>As mentioned at Modification meeting 106, the Committee is asked to review the need for progressing change requests in relation to four ‘undo’ scenarios where non-compliance with the T&SC was identified as part of the Imbalance Pricing Certification Report during I-SEM market trial.</p> <p>Mod 27 18 was raised and discussed to temporary change the Code while the issues, that could not be fixed in time for go live, were being explored further. The final decision, while acknowledging the non-compliance, allowed SEMO to pursue the correction of those items at a later stage, in recognition of the rarity of the occurrence of such scenarios and the need to prioritise more impactful issues. Since then, there has been a long process of negotiation with the vendor resulting in a new classification to changes to the original requirements rather than defects.</p> <p>A high level impact assessment was then returned by the vendor of high risk and high cost for each of the individual scenarios. This initial assessment further highlighted that, due to the complexity of the work involved and the significant impact on systems and vendor’s resources, detailed impact assessments will have to be provided for each of these scenarios individually and they can only be implemented in separate releases. Each detailed Impact Assessment alone has been estimated between 150 and 200 hours which is a substantial cost compared to previous projects.</p> <p>The four scenarios were described in details in the presentation associated with the original Modification. Further analysis has been carried out on production data as issues were being identified and a note was issued by the Modification team on October 18 2021 in advance of Meeting 107. Further to that notification other instances were analysed but none pertained to the scenario covered by this Modification.</p> <p>This Modification deals with:</p> <p>Scenario 2 – SYNC with DESY after reach MSG but before reach Min On Time</p> <ul style="list-style-type: none"> - No instance has been identified in production and no materiality is available <p>Please note that the above analysis may not represent the totality of the affected events but SEMO has not identified any case post market trial. A full review to rule out the existence of other examples is not realistically possible due to the complexity of the analysis.</p> <p>SEMO is satisfied that by changing the T&SC in this case there will be no adverse impact to Market</p>			

Participants.

SEMO proposes that the T&SC is aligned to the system due to the issue not being identified and therefore not having a material impact on the market.

SEMO will pursue system changes for other scenarios where the issue is recurrent and material.

Legal Drafting Change

*(Clearly show proposed code change using **tracked** changes, if proposer fails to identify changes, please indicate best estimate of potential changes)*

Changes to Part B Appendix O: 'INSTRUCTION PROFILING CALCULATIONS'

14. How the Instruction Codes and Instruction Combination Codes are used for the calculation of Physical Notification Instruction Profiles is described in Table 1.

Table 1 – Instruction Codes and Instruction Combination Codes as used for Physical Notification Instruction Profile

PSYN	n/a	SYNC	<p>Continuous open acceptance after SYNC.</p> <p>At Instruction Effective Time set as the later of:</p> <ul style="list-style-type: none">- the time when the corresponding SYNC Instruction Profile reaches Registered Minimum Stable Generation if the time to ramp up is greater than the Minimum On Time; or- the corresponding SYNC Instruction Effective Time plus Min On Time; or- if the MW value of the Registered Minimum Stable Generation corresponds to the MW value of a Soak Time Trigger Point in the applicable Accepted Technical Offer Data, then the time when the corresponding SYNC Instruction Profile reaches Registered Minimum Stable Generation plus the applicable Soak Time, <p>Step 1: create a PSYN to maintain Generator Unit Output to the specified SYNC Target Instruction Level until next Dispatch Instruction or Pseudo Dispatch Instruction;</p> <p>Step 2: with an Instruction Effective Time set equal to the time Step 1 is achieved, adjust Target Instruction Level to Final Physical Notification Quantities.</p> <p>NOTE: PSYN is not created where the Target Instruction Level of the associated SYNC Dispatch Instruction is greater than the Registered Minimum Stable Generation, or where there is a MWOFF Dispatch Instruction issued at the same Instruction Effective Time as the associated SYNC Dispatch Instruction with a Target Instruction Level which is not equal to the Registered Minimum</p>
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			<p>Stable Generation.</p> <p><u>If a subsequent DESY Dispatch Instruction has an Instruction Effective Time which is between the Instruction Effective Time of a prior SYNC Dispatch Instruction and the Instruction Effective Time of the corresponding PSYN Pseudo Dispatch Instruction that would nominally be created, but after the time when the Physical Notification Instruction Profile for the SYNC Dispatch Instruction reaches the Registered Minimum Stable Generation, then the PSYN Pseudo Dispatch Instruction that would nominally be created for the corresponding SYNC Dispatch Instruction shall be created.</u></p>
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Modification Proposal Justification
(Clearly state the reason for the Modification)

Cases related to Scenario 2 ‘SYNC with DESY after reach MSG but before reach Min On Time’ are not expected to happen often, as it is not often that the TSOs would issue instructions to a different target instruction level while a unit is still trying to reach a target instruction level from a previous instruction, and it is rare that units would be issued instructions to desynchronise while their Minimum On Time is still active. The likelihood of these cases has also been reduced through issuing guidance to control centre operators for the TSOs about these situations.

It is expected that the exposure in cases where they do occur would be relatively low.

Code Objectives Furthered
(State the Code Objectives the Proposal furthers, see Section 1.3 of Part A and/or Section A.2.1.4 of Part B of the T&SC for Code Objectives)

This Modification furthers Code Objectives A.2.1.4(a) and A.2.1.4(e):

- (a) to facilitate the efficient discharge by the Market Operator of the obligations imposed upon it by its Market Operator Licences;
- (e) to provide transparency in the operation of the Single Electricity Market;

Implication of not implementing the Modification Proposal
(State the possible outcomes should the Modification Proposal not be implemented)

In light of the vendor assessment of the adjustments needed to the system, it is SEMO opinion that the interest of the market would be best served by leaving the system unchanged.

If this change to the T&SC should not be implemented therefore there would not be substantive compliance between the systems and the rules in certification, and the outcomes in the scenario included in the modification proposal would not be transparent to participants.

<p>Working Group <i>(State if Working Group considered necessary to develop proposal)</i></p>	<p>Impacts <i>(Indicate the impacts on systems, resources, processes and/or procedures; also indicate impacts on any other Market Code such as Capacity Market Code, Grid Code, Exchange Rules etc.)</i></p>
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Please return this form to Secretariat by email to balancingmodifications@sem-o.com

Notes on completing Modification Proposal Form:

1. If a person submits a Modification Proposal on behalf of another person, that person who proposes the material of the change should be identified on the Modification Proposal Form as the Modification Proposal Originator.
2. Any person raising a Modification Proposal shall ensure that their proposal is clear and substantiated with the appropriate detail including the way in which it furthers the Code Objectives to enable it to be fully considered by the Modifications Committee.
3. Each Modification Proposal will include a draft text of the proposed Modification to the Code unless, if raising a Provisional Modification Proposal whereby legal drafting text is not imperative.
4. For the purposes of this Modification Proposal Form, the following terms shall have the following meanings:

Agreed Procedure(s):	means the detailed procedures to be followed by Parties in performing their obligations and functions under the Code as listed in either Part A or Part B Appendix D "List of Agreed Procedures". The Proposer will need to specify whether the Agreed Procedure to modify refers to Part A, Part B or both.
T&SC / Code:	means the Trading and Settlement Code for the Single Electricity Market. The Proposer will also need to specify whether all Part A, Part B, Part C of the Code or a subset of these, are affected by the proposed Modification;
Modification Proposal:	means the proposal to modify the Code as set out in the attached form
Derivative Work:	means any text or work which incorporates or contains all or part of the Modification Proposal or any adaptation, abridgement, expansion or other modification of the Modification Proposal

The terms "Market Operator", "Modifications Committee" and "Regulatory Authorities" shall have the meanings assigned to those terms in the Code.

In consideration for the right to submit, and have the Modification Proposal assessed in accordance with the terms of Section 2 of Part A or Chapter B of Part B of the Code (and Part A Agreed Procedure 12 or Part B Agreed Procedure 12) , which I have read and understand, I agree as follows:

1. I hereby grant a worldwide, perpetual, royalty-free, non-exclusive licence:
 - 1.1 to the Market Operator and the Regulatory Authorities to publish and/or distribute the Modification Proposal for free and unrestricted access;
 - 1.2 to the Regulatory Authorities, the Modifications Committee and each member of the Modifications Committee to amend, adapt, combine, abridge, expand or otherwise modify the Modification Proposal at their sole discretion for the purpose of developing the Modification Proposal in accordance with the Code;
 - 1.3 to the Market Operator and the Regulatory Authorities to incorporate the Modification Proposal into the Code;
 - 1.4 to all Parties to the Code and the Regulatory Authorities to use, reproduce and distribute the Modification Proposal, whether as part of the Code or otherwise, for any purpose arising out of or in connection with the Code.
2. The licences set out in clause 1 shall equally apply to any Derivative Works.
3. I hereby waive in favour of the Parties to the Code and the Regulatory Authorities any and all moral rights I may have arising out of or in connection with the Modification Proposal or any Derivative Works.
4. I hereby warrant that, except where expressly indicated otherwise, I am the owner of the copyright and any other intellectual property and proprietary rights in the Modification Proposal and, where not the owner, I have the requisite permissions to grant the rights set out in this form.
5. I hereby acknowledge that the Modification Proposal may be rejected by the Modifications Committee and/or the Regulatory Authorities and that there is no guarantee that my Modification Proposal will be incorporated into the Code.