

Single Electricity Market

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| Modifications Committee Meeting MinutesMeeting 84belfast – EIRGRID OFFICES 21 june 201810.30 – 15.00 |

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Document History

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| --- | --- | --- | --- |
| **Version** | **Date** | **Author** | **Comment** |
| 1.0 | 6 July 2018 | Modifications Committee Secretariat | Issued to Modifications Committee for review and approval |
| 2.0 | 20 July 2018 | Modifications Committee Secretariat | Committee and Observer review complete |

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 and Agreed Procedures: **Version 20.0**](http://www.sem-o.com/MarketDevelopment/Pages/MarketRules.aspx) |
| [Trading and Settlement Code – Part B](http://www.sem-o.com/Publications/General/TSC%20Part%20B.docx) |
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In Attendance

|  |  |  |
| --- | --- | --- |
| Name | Company | Position |
| **Modifications Committee** |
| Adelle Watson | NIE Networks | MDP Member |
| Anne Trotter | Eirgrid | SO Alternate |
| Barry Hussey | CRU | RA Member |
| Chris Goodman | SEMO | MO Member |
| Colm O’Gormain | SSE | Supplier Member |
| Cormac Daly | Tynagh | Generator Member |
| Jim Wynne | Electric Ireland | Supplier Member |
| Julie Ann Hannon | Bord Gais | Supplier Member (Chair) |
| Marie Therese Campbell | SONI | SO Member |
| Paraic Higgins | ESB | Generator Alternate |
| William Steele | Power NI | Supplier Alternate |
| Kenny Dane | UREGNI | RA Alternate |
| Robert McCarthy | Electricity Exchange | DSU Alternate |
| **Secretariat** |
| Esther Touhey | SEMO | Secretariat |
| Sandra Linnane | SEMO | Secretariat |
| **Observers** |
| Brendan O’Sullivan | Eirgrid | Observer |
| Tom McCartan | Eirgrid | Observer |
| Sean McParland | Energia | Observer |
| Nuala Dunne | SEMO | Observer |

# Semo Update

Secretariat welcomed Colm O’Gormain of SSE to the committee due to changes in membership. Secretariat also welcomed Sandra Linnane of Eirgrid to the committee. Sandra’s role of Market Integration & Modifications Co-ordinator will see her become involved in the management of the meetings going forward.

Minutes from Meeting 83 were read and approved by the Secretariat. The final version of the Minutes is available [here](http://www.sem-o.com/Meetings/Minutes%20Meeting%2083%20version%202.0.docx).

**Programme of Work**

Secretariat presented the Programme of Work and a review of previous meeting actions.

# Review of Actions

|  |
| --- |
| Actions recorded at previous meeting  |
| Mod\_13\_17 Deferral of SEM NEMO Credit Reports and Non Acceptance of contracted quantities Version 2 | * Secretariat to draft Final Recommendation Report - **Closed**
 |
| Mod\_17\_17 Recovery of costs due to invalid ex-ante Contracted quantities in Imbalance Settlement | * Proposer to issue final version of this proposal for review – **Closed**
 |
| Mod\_03\_18 Autoproducer CreditCover  | * Proposer to liaise with Working Group to develop version 2.0 of this proposal following the establishment of said Working Group - **Open**
* Secretariat to establish a Working Group – **Open**
 |
| Mod\_09\_18 Interim Credit Treatmentfor Participants with Trading SiteSupply Units | * Proposer to draft version 2.0 of this proposal – **Closed**
* Secretariat to issue version 2.0 to the Committee for review – **Closed**
* Secretariat to schedule Extraordinary Meeting conference call – **Closed**
* Secretariat to draft Final Recommendation Report -**Closed**
 |
| Mod\_06\_18 Clarification of Marginal Energy Action Price Calculation Including Scenario When All Actions Are Flagged | * Secretariat to draft Final Recommendation Report – **Closed**
* Review possibility of Plain English document in the longer term **- Open**
 |
| Mod\_07\_18 Clarifications of Use Of Variable “b” in NIV and Par Tagging Scenarios | * Secretariat to draft Final Recommendation Report – **Closed**
* Secretariat to escalate specific general query – **Closed**
* Proposer to assess developing Plain English guide - **Open**
 |
| Mod\_08\_18 Meter Data PublicationTiming | * Secretariat to draft Final Recommendation Report - **Closed**
 |
| Mod\_04\_18Reporting and PublicationFor Operational Schedules, DispatchInstructions, Forecast Availability andSO Trades  | * Secretariat to draft Final Recommendation Report - **Closed**
 |
| Mod\_10\_18 Amendment to Capacity Settlement Publication from Monthly to Daily | * Secretariat to draft Final Recommendation Report - **Closed**
 |
| Mod\_11\_18 Correction of MinorMaterial Drafting Errors | * Secretariat to draft Final Recommendation Report – **Closed**
 |
| Mod\_13\_18 Calculating Obligated Capacity Quantities for Units Not Yet Commissioned | * Secretariat to draft Final Recommendation Report – **Closed**
 |
| Mod\_14\_18 Change to Timing of Publication of Trading Day Exchange Rate | * Secretariat to draft Final Recommendation Report – Closed
* Proposer to update agreed legal drafting - Closed
 |
| Mod\_15\_18 Clarifications for Instruction Profiling | * Secretariat to draft Final Recommendation Report – Closed
* Proposer to update agreed legal drafting – Closed
* Project to be advised of concerns re system build implications and communicate this externally – Closed
* Secretariat to draft Final Recommendation Report - Closed
 |
| Mod\_16\_18 Interim Suspension Delay Periods | * Secretariat to draft Final Recommendation Report - Closed
 |
| Mod\_18\_18 Transitional Regulatory Reporting | * Proposer to develop version 2.0 **-**  Closed – Mod Withdrawn
 |

# Deferred Modifications Proposals

## mod\_18\_18 Transitional Regulatory Reporting

Proposer advised that this proposal was to be withdrawn. Due to October go-live timeframe it was felt that the existing Code provision could now be met and an approach to reporting would be devised by project team SEMO at a later date following discussions with regulators and additional work on KPI’s and other contents of the report.

Decision

The proposal was Withdrawn.

**Actions :**

* Secretariat to draft Withdrawal Notice - **Open**

## mod\_03\_18 Autoproducer credit cover

Discussion held under AOB item relating to Programme of Work review.

## mod\_17\_18 transitional provisions for cutover

Proposer delivered a [presentation](http://www.sem-o.com/MarketDevelopment/ModificationDocuments/Mod_17_18%20Transitional%20Provisions%20for%20Cutover%20Version%202.pptx) summarising how the intention was to adopt a pragmatic approach to cutover. This proposal seeks to cancel the final Within Day MSP Software Run resulting in minimal impact in terms of lost Interconnector trading opportunity but extending the tight timelines thus facilitating a suite of cutover activities for both System and Market Operations. Discussion took place covering interconnector trades, EDIL outages, settlement and the convention for referring to other paragraphs within section F11.

The drafting alternatives were discussed at length – agreed drafting to be reflected in the Final Recommendation Report based on agreement between proposer and Regulatory Authorities. A number of minor drafting issues were raised with the proposer happy to reflect those in legal drafting changes. There was clear agreement with the approach being taken and the committee were satisfied to take a vote.

Decision

The proposal was Recommended for Approval.

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| **Recommended for Approval**  |

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| **Recommended for Approval by Unanimous Vote** |
| Cormac Daly | Generator Member | Approved |
| Brian Mongan | Generator Member | Approved |
| William Steele | Supplier Member | Approved |
| Jim Wynne | Supplier Member | Approved |
| Julie-Anne Hannon (Chair) | Supplier Member | Approved |
| Colm O’Gormain | Supplier Member | Approved |
| Paraic Higgins | Generator Alternate | Approved |
| Robert McCarthy | DSU Alternate | Approved |

**Actions :**

* Proposer to change all references to clauses to paragraph references& reflect agreed drafting of paragraph references in Final Recommendation Report - **Open**
* Secretariat to draft Final Recommendation Report – **Open**

# New Modifications Proposals

## mod\_19\_18 Part B housekeeping

Proposer delivered a [presentation](http://www.sem-o.com/MarketDevelopment/ModificationDocuments/Mod_19_18%20Part%20B%20Housekeeping%201.pptx) going into detail on the various changes required. The proposal covers

the following areas :

* Incorrect references
* Variable errors
* Typographical errors
* Drafting errors

Proposer advised that he had considered the various proposals already raised and those currently effective

on the baseline when drafting this proposal and had used the latest legal drafting including changes for

proposals already recommended for approval or implemented. Proposer also highlighted three more

significant items contained within the proposal. A question was raised in relation to one of the more

significant items which amended the granularity of Physical Notification submissions to clarify that only a

subset of units should be affected. Observer confirmed that this was already captured as the amended sub

paragraph only relates to that subset of units.

Proposer noted an additional error not captured in the proposal whereby the definition of Demand Side

Non-Delivery Percentage refers to Demand Site Non-Delivery Percentage in error. It was agreed that this

should be corrected in the FRR.

Committee were in agreement to vote on this proposal subject to legal drafting.

Decision

The proposal was Recommended for Approval.

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| --- |
| **Recommended for Approval – subject to legal drafting** |

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| --- |
| **Recommended for Approval by Unanimous Vote** |
| Cormac Daly | Generator Member | Approved |
| Brian Mongan | Generator Member | Approved |
| William Steele | Supplier Member | Approved |
| Jim Wynne | Supplier Member | Approved |
| Julie-Anne Hannon (Chair) | Supplier Member | Approved |
| Colm O’Gormain | Supplier Member | Approved |
| Paraic Higgins | Generator Alternate | Approved |
| Robert McCarthy | DSU Alternate | Approved |

**Actions :**

* Secretariat to draft Final Recommendation Report – **Open**
* Proposer to update agreed legal drafting – **Open**

## mod\_20\_18 agreed procedures update

Proposer delivered a [presentation](http://www.sem-o.com/MarketDevelopment/ModificationDocuments/Mod_20_18%20Agreed%20Procedure%20Updates.pptx) summarising the requirement for this proposal. Proposer confirmed there were two error corrections and two pieces of additional detail proposed. Invoicing of Variable Market Operator Charges and the respective timelines and processes were discussed at length. Supplier Member suggested that additional detail on the timings of Variable Market Operator Charge invoicing would add clarity and agreed to provide legal drafting for this. Observer agreed to discuss the timing of this process through the Market Trials Liaison Group to ensure that the wider industry is informed.

Generator Member suggested that an amendment to legal drafting related to the use of banking details to be clear that details that had already been approved previously would apply would add clarity and agreed to provide legal drafting for this.

Proposer advised that the proposal would be redrafted and a second version would be brought to Meeting 85 capturing updated legal drafting as agreed with members who had suggested alternatives.

Post Meeting Note

Where SEMO advised at the meeting that the invoicing of Variable Market Operator Charge would include only full Billing Weeks this was incorrect and was based on the intended approach which subsequently changed. Follow up here has indicated that this will be on a calendar month basis which will be captured in version 2 drafting which will now also require a minor change to the Code body clause on these calculations. These timings have been communicated via the Market Trials Liaison Group as agreed.

Decision

The proposal was Deferred

**Actions :**

* Taking committee feedback onboard proposer to submit version 2.0 for the next meeting – **Open**
* Supplier Member to provide wording relating to timing of Variable Market Operator Charge invoicing **– Open**
* Generator Member to provide wording relating to application of banking details - **Open**
* Market Trial team to issue a communication on how this will be implemented – **Closed**

## mod\_21\_18 Application of settlement reallocation

Proposer delivered a [presentation](http://www.sem-o.com/MarketDevelopment/ModificationDocuments/Mod_21_18%20Application%20of%20Settlement%20Reallocation%20Agreements%20to%20Market%20Operator%20Charges%20and%20Settlement%20Document%20Definition%20U.pptx) summarising the requirement for this proposal. Proposer advised of the intent to address ambiguity regarding the use of the term Settlement Document while providing for Settlement Reallocation Agreements to include Market Operator Charges by including them under the Settlement Document definition. This approach was taken in order to negate the need to change the deed so that existing deeds would not have to be to be resubmitted. The practical implication of changing a large volume of Settlement Reallocation Agreement deeds which had already been signed was discussed in detail.

Generator Alternate noted that they would like to complete an internal legal review to ensure that the approach of changing the Settlement Document definition rather the deed itself is robust. Proposer noted that since raising the proposal a potential issue with the approach of changing the Settlement Document definition in terms of the VAT agreements/treatments received from the tax authorities in each jurisdiction. This relates to differing treatments of VAT for Market Operator Charge invoices and Settlement Documents for energy and capacity settlement.

While there was broad agreement in principle it was agreed that the proposal should be deferred to allow time for further internal legal review by both Participants and SEMO.

Decision

The proposal was Deferred.

**Actions :**

* SEMO and Participants to seek internal legal counsel on issues raised prior to further discussion at meeting 85 – **Open**

## mod\_22\_18 part b credit cover signage and subscript correction

Proposer delivered a [presentation](http://www.sem-o.com/MarketDevelopment/ModificationDocuments/Mod_22_18%20Part%20B%20Credit%20Cover%20Signage%20and%20Subscript%20Correction.pptx) summarising the requirement for this proposal. Proposer went into detail on the corrections as covered in the presentation.

The proposer explained that under Part A of the Trading & Settlement Code the convention is that Charges, demand and other offtakes from the pool are

Positive values labelled as charges/demand/export whereas in Part B the convention is for charges and offtakes to be negative values. As this convention was introduced late in the drafting, signage implications it had for some credit calculations were not addressed prior to designation of the rules so that these now need to be corrected. Proposer also advised that the proposal seeks to address an issue with the treatment of subscripts for Historical Assessment Periods which are incorrect in Part B.

Minor legal drafting changes to remove an incorrect sub paragraph (d) in the ‘where’ clause for paragraph G.14.2.4 which was unintentionally added in the proposal were discussed and agreed. Committee were in agreement to vote on this proposal subject to legal drafting.

Decision

The proposal was Recommended for Approval.

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| --- |
| **Recommended for Approval**  |

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| --- |
| **Recommended for Approval by Unanimous Vote** |
| Derek Scully | Generator Alternate | Approved |
| David Gascon | Generator Alternate | Approved |
| Brian Mongan | Generator Member | Approved |
| William Steele | Supplier Member | Approved |
| Jim Wynne | Supplier Member | Approved |
| Julie-Anne Hannon (Chair) | Supplier Member | Approved |
| Eamonn O’Donoghue | Interconnector Member | Approved |
| Paraic Higgins | Generator Alternate | Approved |
| Robert McCarthy | DSU Alternate | Approved |

**Actions :**

* Remove reference to sub paragraph (d) within paragraph G.14.2.4 in FRR - **Open**
* Secretariat to draft Final Recommendation Report - **Open**

# AOB/upcoming events

Elections & 2018 Schedule

* Notice of expirations to be issued to relevant member shortly with call for nominations to be issued July

Programme of Work Review

* Secretariat discussed steps required to progress Mod\_03\_18 Autoproducer Credit Cover. Possible timescales were discussed regarding the establishment of a working group and development of version 2.0 of this proposal. Proposer has communicated that the interim measures in place are working satisfactorily and expressed their wish to be involved in any subsequent working group. Committee agreed to review this proposal at the next meeting and review timescales. Regulatory Authorities noted their FRR on Mod\_03\_18 ensures a more generic reference to ‘Day 2’ for that Mod has been applied so it’s not directly reliant on MOD\_03\_18.
* SEMO presented analysis undertaken following the RA decision to request further work on Mod\_02\_17 Unsecured Bad Energy Debt & Unsecured Bad Capacity Debt Timelines. SEMO highlighted that there had been changes to banking timelines in this area.

**Actions :**

* Taking committee feedback onboard proposer to submit version 2.0 of Mod\_02\_17 for Part A and submit a new proposal to address this issue in Part B for the next meeting – **Open**

D+2 Update

MO Member provided summary of modifications previously approved to be included in D+2 process.

It was noted that Day 2 issues will not be progressed any sooner than go-live.

**Actions :**

* D+2 written update to be provided for each meeting - **Open**

# Appendix 1 – Programme of Work as Discussed at Meeting 84

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| --- |
| **Status as at 21st June 2018** |
| **Modification Proposals ‘Recommended for Approval’ without System impacts** |
| **Title** | **Sections Modified** | **Sent** |
| Mod\_18\_17 Net Inter Jurisdictional Flow Submission | Appendices – Appendix LGlossaryAgreed Procedure 16 – 1.2, 2.2, 2.3, Appendix 1 | 15 March 2018 |
| Mod\_13\_17 Deferral of SEMO NEMO Credit Reports and Non Acceptance of Contracted Quantities | Part B clauses G.12.2, G.12.3, F.2.2.3, B.19.2.1, H.9 and H.10Part B Agreed Procedure 09 sections 2.5.2 and 3.1New Glossary Definition – Mod\_XX\_17 Deployment Date | Committee review complete by 22 June 2018 |
| Mod\_09\_18 Interim Credit Treatment for Participants with Trading Site Supply Units | T&SC Part BGlossary Part BSection H | 25 May 2018 |
| Mod\_11\_18 Correction of Minor Material Drafting Errors | T&SC Part BSections F and G | 25 May 2018 |
| Mod\_07\_18 Clarifications of use of variable “b” in NIV and PAR Tagging scenarios | AppendicesAppendix N | Committee review complete by 22 June 2018 |
| Mod\_13\_18 Calculating Obligated Capacity Quantities for Units Not Yet Commissioned | T&SC Part BSection F | 20 June 2018 |
| Mod\_14\_18 Change to timing of publication of Trading Day Exchange Rate  | T&SC Part BPart B Appendix EAgreed Procedures Part BGlossary Part B | 20 June 2018 |
| Mod\_15\_18 Clarifications for Instruction Profiling | Appendices Part BAppendix O | 20 June 2018 |
| Mod\_16\_18 Interim Suspension Delay Periods | T&SC Part BT&SC Part B Glossary | 20 June 2018 |
| **Modification Proposals ‘Recommended for Approval ’ with System impacts** |
| N/A | N/A | N/A |
| **Modification Proposals ‘Recommended for Rejection’** |
| N/A | N/A | N/A |
| **RA Decision ‘Further Work Required’** |
| Mod\_02\_17 Unsecured Bad Energy Debt and Unsecured Bad Capacity Debt Timelines | T&SC Section 6.5AP15 | 25 August 2017 |
| **RA Decision Approved Modifications with System Impacts** |
| Mod\_03\_17 Treatment of Transmission Losses for Trading Sites with Contiguous Auto producers in I-SEM | I-SEM TSC F.4 | 17 October 2017 |
| **RA Decision Approved Modifications with no System Impacts** |
| Mod\_04**\_**17 Solar in the Single Electricity Market | Noted in proposal form | 24 October 2017 |
| Mod\_5\_17 Amendment to Part B Form of Authority for the purpose of removing the Restricted Authority provision | Appendix C – Form of Authority | 24 October 2017 |
| Mod\_07\_17 : Credit Assessment Volume for Generator Units | T&SC Part B Clause G.14.4.1Glossary Part BDefinition - Credit Assessment Volume Variable - VCAG | 6 February 2018 |
| Mod\_08\_17 : Decremental Price Quantity Pair Submission | T&SC Part B D.4.1.1, D.4.4.2, D.4.4.10, D.4.4.11 | 6 February 2018 |
| Mod\_09\_17 : Solar in I-SEM | See Mod Proposal | 6 February 2018 |
| Mod\_11\_17 : Deferral of Information Imbalance Charges | Part B Section H.6Part B Appendix G paragraph 14Part B Glossary | 9 February 2018 |
| Mod\_06\_17 Transitional Credit Cover Provisions | Part C Introduction, Part C Section 11, Part C Glossary and Part C Appendix | 26 February 2018 |
| Mod\_10\_17 Ex-Ante Quantities Deferral | Part B Section FF.5.2.6F.5.2.7F.5.2.8F.5.2.9Part B Section H.8H.8.1H.8.2H.8.3H.8.4 | 26 February 2018 |
| Mod\_12\_17Outage Adjusted Wind and Solar Forecast Reports | Part B Appendix E Table 4Part B AP06 Appendix 2 | 29 March 2018 |
| Mod\_14\_17 Part B Suspension When Suspended Under Part A | T&SC Part B Section B.18.3.1 | 29 March 2018 |
| Mod\_15\_17 Credit Treatment for Adjusted Participants | T&SC Part B;G.12.4.3, G.14.1.2, G.14.1.3, G.14.3, G.14.3.1, G.14.3.2, G.14.3.3, G.14.4, G.14.4.1, G.14.4.2, G.14.5, G.14.5.1, G.14.5.2, G.14.6, G.14.6.1, G.14.8 and G.14.8.1Glossary Part B;Adjusted Participant, Credit Assessment Adjustment Factor and Variable FCAAAgreed Procedures Part B;2.11.2 | 29 March 2018 |
| Mod\_16\_17 Funding in Relation to Eirgrid/SONI Payment Obligations | T&SC Part BGlossary Part B | 20 April 2018 |
| Mod\_17\_17 Recovery of Costs due to Invalid Ex-Ante Contracted Quantities in Imbalance Settlement | T&SC Part BSection G | 20 April 2018 |
| Mod\_04\_18 Reporting and Publication for Operational Schedules, Dispatch Instructions, Forecast Availability and SO Trades  | Part B Appendix E Tables 4 and 8 new Table 10Part B Agreed Procedure 6 Appendix A | 20 June 2018 |
| Mod\_05\_18 Clarification of Administered Scarcity Pricing function for scenarios not yet covered in rules | T&SC Part BSection E.4.2, E.4.3 | 20 June 2018 |
| Mod\_06\_18 Clarification of Marginal Energy Action Price calculation including scenario when all actions are flagged | T&SC Part BE 3.4.2 | 21 June 2018 |
| Mod\_08\_18 Clarification of rules used to determine the value of Price Average Reference Tag (TPAR) | Appendices Part BAppendix N clauses 11,12 and 13 | 21 June 2018 |
| Mod\_10\_18 Amendment to Capacity Settlement Statement Publication from Monthly to Daily | T&SC Part BAppendices Part BAgreed Procedures Part BPart B section G.2.5.2Part B Agreed Procedure 15 section 3.2 (Table and Swimlanes) | 20 June 2018 |
| **RA Decision Rejected** |
| N/A | N/A | N/A |
| **AP Notifications** |
| Mod\_01\_18 Notification of Suspension to SEM NEMOs | AP 18 Suspension and TerminationSection 3.3 – Issuing a Suspension Order | Effective 5 April 2018 |
| Mod\_02\_18 Meter Data Publication Timing | AP06 Appendix 2 – Report Listing | To be published |
| Mod\_12\_18 Modification to Part B Agreed Procedure 17 | Agreed Procedure 17 Part B | To be published |
| **Withdrawal Notifications** |
| N/A | N/A | N/A |
| **Modification Proposal Extensions** |
| N/A | N/A | N/A |
| * **Meeting 85 – 16 August 2018 : Dublin**
* **Member Elections commencing July**
* **Chair/Vice Chair Elections commencing September**
 |