



## Single Electricity Market

### MODIFICATIONS COMMITTEE MEETING MINUTES

MEETING 100  
CONFERENCE CALL  
20 AUGUST 2020  
10.00AM – 2.00PM

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**Document History**

Version	Date	Author	Comment
1.0	27 <sup>th</sup> August 2020	Modifications Committee Secretariat	Issued to Modifications Committee for review and approval
2.0	29 <sup>th</sup> September 2020	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
<a href="#">Balancing Market Rules – Trading and Settlement Code &amp; Agreed Procedures</a>
<a href="#">Mod_13_19 Payment for Energy Consumption in SEM for non-energy Services Dispatch</a>
<a href="#">Mod_15_19 Clarification to the description of the role of the Dispute Resolution Board under the TSC</a>
<a href="#">Mod_06_20 Removing the requirement for a Monthly Load Forecast</a>
<a href="#">Mod_08_20 Imbalance prices to reflect the real-time value of energy</a>
<a href="#">Mod_09_20 Number of days for interest calculation</a>
<a href="#">Mod_10_20 Rescind CCIN via email when indicative settlement is delayed and settlement team can verify volumes</a>

**In Attendance**

Name	Company	Position
<b>Modifications Committee (voting members)</b>		
Paraic Higgins (Chair)	ESB	Generator Member
Eamonn Boland	IWEA (Brookfield Renewable)	Supplier Alternate
Bryan Hennessey	Naturgy	Supplier Member
Philip Carson	Power NI	Supplier Member
Stacy Feldmann	SSE	Generator Member
David Gascon	Bord na Mona	Generator Alternate
Kevin Hannafin	Energia	Generator Member
Ian Mullins	Bord Gais	Supplier Member
Robert McCarthy	Electricity Exchange	DSU Alternate
Alan Mullane	ElectroRoute	Assetless Member
Adelle Watson	NIE Networks	MDP Member
Christopher Goodman	SEMO	MO Member
Brian Malone	EirGrid	SO Alternate
<b>Modifications Committee (Non-Voting Members)</b>		
Barry Hussey	CRU	RA Member
Gina Kelly	CRU	RA Alternate
Karen Shiels	UR	RA Alternate
Katia Compagnoni	SEMO	MO Alternate
Leigh Greer	Uregni	RA Member
<b>Secretariat</b>		
Sandra Linnane	SEMO	Secretariat
Esther Touhey	SEMO	Secretariat
<b>Observers</b>		
Rowan Tunncliffe	Moyle Interconnector Ltd	Observer
John Tracey	EirGrid	Observer

Niamh Delaney	EirGrid	Observer
Thomas O'Sullivan	Aughinish	Observer
Sinead O'Hare	Power NI	Observer
Elaine Gallagher	SEMO	Observer
Adam Fitzpatrick	CRU	Observer
Mark Needham	SEMO	Observer
Rochelle Broderick	Budget Energy	Observer
Mark Phelan	Electric Ireland	Observer
Ronan Doherty	ElectroRoute	Observer
Alex McClean	Arthur Cox	Observer

## 1. SEMO UPDATE

The Secretariat welcomed all to Modifications Committee Meeting 100. The minutes for Meeting 99 were read and approved.

An update was provided on Elections 2020 with welcome given to new Members and thanks extended to those no longer on the Committee. A reminder was given that the Chairperson elections will commence shortly with a reminder that Members only have one vote each. Acknowledgements were also given to the RAs for nominating, in accordance with T&SC provisions, a Supplier Member to the Panel, as the number of nominations received was not sufficient to fill the vacant seats. The RA Member briefly explained the process followed in this case.

SEMO provided an update on the action to provide an Impact Assessment for Mod\_03\_18 'Autoproducer Credit Cover' explaining that, due to the intricate nature of the Modification, the costs (specifically vendor only) were on the higher end of the medium range with an additional risk of deterioration of Settlement System's performances. An interim Modification on the matter is currently in effect successfully dealing with the issues so far, although lacking in transparency and a DSU Member explained they were looking for a more solid and unambiguous solution. An RA decision on Mod\_03\_18 is currently on hold and due to the Modification having been recommended for approval pending Impact Assessment; it was prudent to bring the issue back to the Panel for further considerations after having discussed this with the Proposers.

A DSU Member gave more context to the new solution from a DSU perspective. It was advised that the current drafting worked fine, but it was flawed and did not provide transparency for new units. It was noted that it would impact collateral rather than market cost. The interim solution solves the initial problem but would need tightening up to make it enduring. Recently this resulted in a problem for a new unit being registered where incorrect Credit Cover was initially calculated.

SEMO explained to the Committee that there were 3 options:

- to continue with the interim solution,
- to proceed with the more sophisticated costly solution or
- to try to refine the interim solution to make it more robust and transparent.

The Proposer agreed that the Modification did have a material impact and the risk to the overall system performance was worrying. A Generator Member suggested that a potential plan B should be explored or more focus given to improving the interim solution. The RAs Member asked about previous concerns being

expressed by SEMO with regards to certain obligations being assigned to the Market Operator with potentially new manual processes. The SEMO Member assured that after having done the ground work they were satisfied these concerns had now been mitigated and a solution could be found with the Proposers to improve the interim solution.

DSU agreed with the above explaining that the interim provisions could be continued but they would be codified into an enduring set being appropriately modified. It was noted that the interim was only intended for 18 months to 2 years and there was currently no clarity on adjusting volumes going forward.

The RAs advised that the discussion held should be documented and that existing interim arrangements should be further codified. The RAs agreed to consider this in making its decision on this Modification.

**Actions:**

- SEMO to work with Proposers to amend interim solution – **Open**
- RAs to provide a decision to either reject current Mod\_03\_18 or to recommend further work to be carried out. - **Open**

MOD_03_18 Autoproducer Credit Cover	<ul style="list-style-type: none"> <li>• SEMO to provide vendor impact assessment for existing proposal – <b>Closed</b></li> </ul>
MOD_13_19 Payment for Energy Consumption in SEM for non-energy Services Dispatch	<ul style="list-style-type: none"> <li>• SEMO and the proposer to investigate feasible ways to implement a solution in the market. – <b>Closed</b></li> <li>• MDPs and TSOs to continue to explore ways to get the data to the Balancing Market including potential manual options – <b>Ongoing</b></li> <li>• Secretariat to convene a Working Group in September / October 2020 – <b>Ongoing</b></li> <li>• Proposer to provide an update at the August Meeting - legal drafting to be progressed to lead on to Working Group in September / October - <b>Ongoing</b></li> </ul>
MOD_15_19 Clarification to the description of the role of the Dispute Resolution Board under the TSC	<ul style="list-style-type: none"> <li>• Secretariat to provide update on progress of this modification once approval received from the RAS to proceed with procurement – <b>Ongoing</b></li> </ul>
MOD_17_19 DSU State Aid Compliance Interim Approach	<ul style="list-style-type: none"> <li>• SEMO take a long term action to undertake mid tariff year (summer 2020) review of the cost of the change on Imperfections Charges post implementation to track any substantial increase in costs- <b>Long Term Action</b></li> </ul>
MOD_01_20 PMEA No Energy Action Same Direction as NIV	<ul style="list-style-type: none"> <li>• SEMO, RAs and members to review EBGL and Clean Energy Package for any interactions – <b>Closed</b></li> <li>• SEMO and Proposer to complete analysis on the impact on Imbalance Pricing and circulate as soon as practicable – <b>Closed</b></li> <li>• SEMO and TSOs to analyze impact on Premium and Discount payments and Imperfections – <b>Closed</b></li> <li>• Members to carry out analysis/investigation</li> </ul>

	to better understand the implications of the proposal and share it with the Panel as soon as available - <b>Closed</b>
MOD_06_20 Removing the Requirement for a Monthly Load Forecast	<ul style="list-style-type: none"> <li>Participants to review this Modification Proposal at the end of the year to consider whether the Monthly Load Forecast should be retained for forecast assessment in Secondary Trading – <b>Open</b></li> <li>Members to provide any issues or comments on new publishing system for monthly load forecast at next Modifications Meeting - <b>Open</b></li> </ul>
MOD_07_20 Balancing Modifications Committee Composition and constitution definitions	<ul style="list-style-type: none"> <li>Proposer to split out elements of the proposal into 2 or 3 new distinct proposals as appropriate and potentially withdraw Mod_07_20 - <b>Open</b></li> </ul>
Settlement Update	<ul style="list-style-type: none"> <li>Proposer to quantify the current impact on over-collateralization to Participants is – <b>Ongoing</b></li> </ul>

**2. DEFERRED MODIFICATION PROPOSALS**

**MOD\_13\_19 PAYMENT FOR ENERGY CONSUMPTION IN SEM FOR NON-ENERGY SERVICES DISPATCH**

The Proposer provided a brief background on this Modification noting that an Industry Conference Call took place on 21<sup>st</sup> July 2020 where 4 options were discussed in order to progress this Modification and minutes for this call were published on the SEMO website.

It was advised that there were a number of follow up emails after this meeting and it was agreed that option 4 would be progressed as an interim solution and option 1 as a potential long term solution when assessment and interpretation of Article 13 and 14 of CEP are furthered. The Proposer reminded the Committee that a Working Group would be scheduled shortly and it was confirmed by the Secretariat that this would take place once the legal drafting was complete.

A discussion ensued on the development of this Modification and if a Working Group could be convened without legal drafting. The Secretariat reminded the Proposer and Committee of an action taken at Meeting 99 for the Proposer to develop the legal drafting prior to a Working Group taking place in order to prepare the Terms of Reference. The Proposer agreed and assured all that this would be done.

The Chair suggested that another industry call could be scheduled to progress the legal drafting and once this was complete a new version of the Modification could be submitted. The Proposer agreed with this and assured the Committee that an invite would be extended to all Participants and the Modifications Committee.

**Decision**

This Proposal was deferred.

**Actions:**

- Proposer to schedule further industry call if needed to progress legal drafting and submit a version 2 of this Modification before terms of Reference for a Working Group could be drafted - **Open**

### MOD\_15\_19 CLARIFICATION TO THE DESCRIPTION OF THE ROLE OF THE DISPUTE RESOLUTION BOARD UNDER THE TSC

The Secretariat provided an update on the action from this Modification providing assurance to Members that legal procurement had been progressed. A further update would be provided at Meeting 101 on 22<sup>nd</sup> September 2020 and a follow up email would be sent as soon as able to circulate the external legal advice.

#### *Decision*

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This Proposal was deferred.

### MOD\_06\_20 REMOVING THE REQUIREMENT FOR A MONTHLY LOAD FORECAST

A SEMO Alternate provided an update on this Modification reminding Members that there was an open action on Participants to confirm that they could download the forecast from the new webpage on the SEMO website which was circulated following meeting 99. This was in parallel with checks to occur once Secondary Trading was in place, to verify whether this file could be removed or would still be required.

A number of Participants admitted they had been unable to confirm if there were any issues with the new publishing page and they requested the link to be circulated again. The Secretariat confirmed they could do that adding a time limit for Participants to confirm whether they could download it without issues.

#### *Decision*

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This Proposal was deferred.

#### **Actions:**

- Secretariat to circulate link to forecast report to Committee – **Open**
- Participants to confirm if there are any issues with the new file location– **Open**

### MOD\_07\_20 BALANCING MODIFICATIONS COMMITTEE COMPOSITION AND CONSTITUTION DEFINITIONS - UPDATE

The RAs Member provided an update on this Modification which was withdrawn following Modifications Meeting 99. It was noted that there was an intention to progress with the action to provide separate proposals but the Proposer confirmed that this was still under consideration.

The Proposer noted that good points were raised at the last meeting and following a review period it was agreed that a different approach could be explored so they may submit an altogether new solution, such as similar to the UK model where there is no distinction between Generators and Suppliers. Although this may sound radical, in effect it may lead to a similar constitution to the current one.

A Supplier Member enquired if all of the points raised by Members previously would be accounted for. The Proposer gave assurance that all of the suggestions would be reviewed but in light of the recent election results a different approach may be needed.

**Actions:**

- Proposer to split out elements of the proposal into 2 or 3 new distinct proposals as appropriate and potentially withdraw Mod\_07\_20 - **Open**

**3. NEW MODIFICATION PROPOSALS****MOD\_08\_20 IMBALANCE PRICES TO REFLECT THE REAL-TIME VALUE OF ENERGY**

Before the Proposer began the [presentation](#), the RAs requested permission to provide a brief commentary to the slides submitted. The RAs advised that original Mod\_10\_19 was discussed last year and it was of high importance to implement a SEMC decision that deemed it inappropriate for Dispatchable Priority Dispatch units to set imbalance prices.

It was confirmed that significant consideration was given to the latest draft of the EBGL provisions and when making the original decision on T&SC development, the legal requirements were always taken on board and the Modification had always been considered fully compliant with EBGL and any other applicable law.

The RAs rejected the view expressed by the Proposer in the presentation that throughout the process the RAs ignored that Mod\_10\_19 was potentially non-compliant. In fact not only was this not the case, but substantial consideration was given to compliance. The RAs reflected on the unfortunate choice of words in the drafted Decision letter that lead to a lack of clarity. The RA Member acknowledged that this might have given the impression that the Mod\_10\_19 was only approved because EBGL had not yet come into effect, but unequivocally EBGL provisions had been reviewed in great detail, together with all other applicable laws, and the RAs were satisfied that, on the contrary, the market would be in a position of non-compliance should Mod\_10\_19 not be approved.

The RAs summarized the purpose of the Modifications Committee which was to review changes to legal drafting in line with the SEM Committee determinations. The RA Member also asked the Committee to bear in mind that the TSOs and SEM Committee will publish a consultation on the subject of compliance with EBGL that should be taken into consideration before voting on this Modification. The RAs also believed that there were points within this presentation that were somewhat extreme and needed explanation.

Following the RAs' introductory comments, the Proposer then delivered a presentation for Mod\_08\_20 noting it was very simple in its purpose which seeks to maintain the status quo and reverse Mod\_10\_19 which the Proposer believed to be inconsistent with the requirements of EBGL and Commission Regulation (EU) 2019/943 of 5 June 2019 ("the Electricity Regulation") and which was termed by the Proposer as "illegal".

Through the course of the presentation, the Proposer went through the points which summarized why in the Proposer's view Mod\_10\_19 would eventually cause further problems to the market as it deflates prices to zero inappropriately removing a valid price signal. The Proposer further opined that this Mod\_10\_19 was heavily debated and rejected by the Committee, a rejection then overturned by the SEMC.

The Proposer noted that the Decision letter was written by the RAs in October 2019, while EBGL did not enter into force until 31<sup>st</sup> December 2019. The statement in the decision alluding that the Modification could pass as a result of this, suggested awareness of what the Proposer termed its "illegality" and it was the Proposer's opinion that as the real time value of energy was not reflected in the Imbalance Price therefore the Mod\_10\_19 should not be allowed to proceed to be systemized.

The Proposer stated that they had raised Mod\_08\_20 after getting legal advice and invited their legal representative, an Observer, to address the meeting. The Proposer's legal representative presented the next number of slides noting that in the RAs comments and previous correspondence there was a focus on EBGL but less focus on Electricity Regulation which was no less important. It was advised that neither the Electricity Regulation nor EBGL were in force in October last year and did not come into effect until 31<sup>st</sup>

December 2019 and 1<sup>st</sup> January 2020 respectively. The Proposer's legal representative stated that at the core of both Regulations was the principle that imbalances must be settled at the real time value of energy. This Observer went on to state that compliance with EU Regulations was not something in respect of which the RAs had a discretion, and that regulations are directly applicable with no requirement to incorporate the provisions into national law.

The Proposer referenced Articles 3(c), 3(g) and Article 6(5) which contained explicit provisions which the Proposer considered would make Mod\_10\_19 "illegal".

In addition the Proposer referred to Article 6(5) which stated that imbalances have to reflect real time of energy. The Proposer suggested that this would mean that it needs to be price bid by marginal unit not a replacement price from the one submitted, and if that number was substituted the price could be inaccurate.

The question was raised on whether the RAs are entitled to proceed with Mod\_10\_19 given the points raised and was important to note that a change can't be implemented where we haven't completed analysis on requirements for this. It was further re-iterated that an intervention on balancing prices has to reflect the real time value of energy. A request for more analysis was made while the status quo is preserved.

The Proposer advised they had engaged with the RAs and were informed the RAs were comfortable to proceed but were never provided with evidence as to why. The Proposer stated that an RA assurance was given that a full review of EGBL compliance was underway however the Proposer noted that the outcome of this review would be available by the end of December 2020 at which point the deployment of Mod\_10\_19 would have taken place already. The Proposer reminded the Committee of the consequences in either accepting or deferring this Modification.

A Generator Member agreed that compliance with EBGL was important for Mod\_10\_19 and for future Modifications but they needed more information to substantiate any claim by the Proposer of alleged "illegality" or inconsistency with either EGBL or other applicable legislation. The new Members of the Committee were advised about the history of past Modifications and that it would be highly unusual to implement changes without a proper Impact Assessment. The RAs Member responded noting that during the debate over Mod\_10\_19 questions around legality were addressed and considered when taking its decision.

The RAs Member also stated that the current Modification was subject to legal correspondence between the SEM Committee and ElectroRoute which limited the ability to provide further details in such context. The RAs confirmed their strong view that Modification\_10\_19 is compliant with EBGL because priority dispatch actions are a form of redispatch and are therefore non-energy actions, and disagreed that this Modification undermines the market principles but actually fully strengthens them. The RA Member stated flagging and tagging was designed to distinguish between energy and non-energy actions and that the latter should not affect price formation. The RAs affirmed that accepting the Proposer's interpretation and pausing the implementation of Mod\_10\_19 would in fact make the Market non-compliant, with both EBGL and the Electricity Regulation.

The Assetless Member argued that such analysis was never made available to the Committee and if no acceptable justification was provided the prudent thing was to pause the implementation of Mod\_10\_19 until proper analysis was completed and shared. The RAs confirmed to the Proposer that they would provide a written response to their recent legal correspondence and they would favour deferring Mod\_08\_20 till after the TSO consultation, when everyone in industry would have an opportunity to fully consider the matters.

A DSU Member asked if going back on Mod\_10\_19 and staying with the status quo was illegal itself. It was asked if this Modification should be considered not knowing what position this would leave the market in. The Proposer confirmed that they were comfortable with the status quo because the Commission had provided written approval in April 2020 following Ireland's plan submission. An RA Alternate stated that the Commission Opinion was for a different area of the legislation associated with the implementation plan required under Article 20(3) of the Electricity Regulation and did not apply to the items under discussion.

The Chair addressed the interpretation of CEP Recast Regulation Article 13 again and how it works. A Priority Dispatch list is given to the TSO containing a number of different units with different prices. When Priority Dispatch units are DEC'd (decreased) they would be flagged out because it is a non-energy action but the TSO has no sight of whether the price of such unit is zero or -200 and therefore that cannot reflect the real cost of Energy. Reversing the previous Modification would leave the Market in a situation of uncertainty. If Priority Dispatch units have different prices but the TSO has no choice in which one to DEC, then this cannot be a true reflection of Energy prices. An Observer replied that these prices represent an investment signal and urged Members to vote for this Modification. Even if the Panel's recommendations were to be overturned for a second time, at least that would send a signal of discontent to the RAs and add some urgency in the release of further information.

The RA Member noted that the question had not been fully addressed by the Observer in his response.

A Generator Member noted that Release F, which would implement Mod\_10\_19, is already advanced and shared concerns over the lack of further details from both sides of the argument.

Another Generator Member suggested further discussion on this and the idea that a further Working Group or an Extraordinary Meeting could help but noted that time was not on their side as the change was due to take place in October. Some discomfort was expressed at the statement of the proposer that Mod\_10\_19 was illegal, and therefore raised the query as to what the situation would be if Mod\_10\_19 was reversed. It was suggested that an Extraordinary Meeting might vote on Mod\_08\_20 in advance of Release F with more information from both sides might be the best outcome of from this Meeting 100.

A number of Generator and Supplier Members agreed with furthering the discussion on this and would be reluctant to vote without proper revision and analysis of more evidence.

An Observer requested the Committee to reflect on the problem raised. He noted that the extent of the debate clearly indicated that there was a substantial issue and a procedural one discussed at this meeting and while the focus was on the substantial side of it, strong procedural issues have been identified pointing out that Mod\_10\_19 was approved last year without the inclusion of the rationale on whether Mod\_10\_19 would be compliant. Now that the Regulations are in force, it is incumbent on the RAs to ascertain whether it is lawful for them to now proceed to implement Mod\_10\_19 before doing so. That analysis should be shown. The Proposer indicated that they had sought repeated assurances that Mod\_10\_19 would not be implemented without this analysis being completed. The Proposer went on to say that they would be deeply concerned to proceed with the release in such circumstances.

The Chair asked the Members to specify a bit more what type of info would they require to be able to decide on the matter, and various Members replied that they would like to see more details on the compliance analysis and on the implications in relations to art.13 of Electricity Regulation and others should the change be reverted.

The RAs Member indicated that they were constrained in their ability to respond due to the legal correspondence that had been received from the Proposer's legal representatives, but agreed and, with the Proposer's consent, to make the correspondence from the RAs to the Proposer available to the Committee when such correspondence is issued. The RAs reiterated that Mod\_10\_19 does comply with both EBGL and with Article 13 of Electricity Regulation and if Mod\_10\_19 was rolled back that this compliance would not be the case. An agreement was reached that such correspondence would be circulated to the Committee Members but also more information from the Proposer would be required on how this Modification takes into consideration redispatch of Priority Units. This would be needed to understand the consequences of accepting or rejecting this Modification at an Extraordinary Meeting to be convened.

The Chair suggested that this Modification be deferred to allow circulation of additional information from both the Proposers and the RAs and, following that, the Secretariat should try and arrange an Extraordinary Meeting as soon as possible to discuss the issue further.

The RAs noted it would take them a couple of weeks to draft legal correspondence and to get it approved internally and also wished to manage expectations as it would not be possible to give too many details while a consultation was ongoing. The Proposer requested them to act quickly on this and advised that the

Extraordinary Meeting should be held in a matter of days as the release’s deployment date in October approaches fast. Secretariat advised that an Extraordinary Meeting required a quorum to take place and asked for member’s co-operation. The Secretariat also advised that the requested additional information, captured as actions below, must be reviewed by Members in advance of any meeting.

**Decision**

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This Proposal was deferred.

**Actions:**

- RAs to provide written response to ElectroRoute’s legal correspondence - **Open**
- Proposer to also provide their analysis of compliance with Art.13 of CEP should Mod\_10\_19 be reversed - **Open**
- Secretariat to circulate documentations received in support of the above actions and to organize an Extraordinary Meeting - **Open**

**MOD\_09\_20 NUMBER OF DAYS FOR INTEREST CALCULATION**

The Proposer provided some background on this Modification noting that there was an error in the drafting of the current version of AP15 which would be corrected by changing the word “previous” to “original”. The current version of the AP is not correct and to fix this will cause no impact to Settlement Systems which have been implemented according to the proposed interpretation and in line with the main body of the T&SC and the previous market.

A Generator Alternate asked if the interest should be calculated on the previous settlement in M+4 and M+13. The Proposer explained why this would not be the case noting that the Participant should be paid correctly the first time around so the interest calculation should always refer back to the Initial Settlement Document.

The Proposer summarized that this Modification’s aim was to tidy up an inconsistency between the AP and the main body if the T&SC which has the correct wording and there was agreement amongst the Committee that this Modification could achieve this and that a vote could be taken.

**Decision**

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This Proposal was Recommended for Approval.

Recommended for Approval by Unanimous Vote		
Paraic Higgins (Chair)	Generator Member	Approve
Eamonn Boland	Supplier Alternate	Approve
Kevin Hannafin	Generator Member	Approve
Ian Mullins	Supplier Member	Approve

Stacy Feldmann	Generator Member	Approve
Alan Mullane	Assetless Member	Approve
Robert McCarthy	DSU Member	Approve
Philip Carson	Supplier Member	Approve
Bryan Hennessy	Supplier Member	Approve
David Gascon	Generator Alternate	Approve
Adelle Watson	MDP Member	Approve
Chris Goodman	MO Member	Approve
Brian Malone	TSO Alternate	Approve

**Actions:**

- Secretariat to draft AP Notification - **Open**

**MOD\_10\_20 RESCIND CCIN VIA EMAIL WHEN INDICATIVE SETTLEMENT IS DELAYED AND SETTLEMENT TEAM CAN VERIFY METER VOLUMES**

The Proposer gave a background on this Modification noting that, following the latest review and comments received, the final wording will need to be updated therefore a vote was not sought today but it would be good to discuss it. A list of the various changes to be made was provided and confirmation given that there would be a change to AP procedures also. This Modification would ensure that Participants are not penalized in specific circumstances when the Indicative Settlement would be delayed.

The Proposer went through the Modification Proposal and clarified that no Working Groups would be required along with no system updates. It was noted the only impact would be on the settlement team as the changes would be mainly procedural and would be done manually.

A DSU Member asked if a Market Message could include details of the delays and what they were due to, so that Participants could have an idea on whether their Credit Cover calculation could be affected by this issue or not. The Proposer replied that SEMO would endeavor to include all available details in the message and there would also be detailed communications with the affected parties.

The Chair asked if an analysis of past events had been made. It was advised that this had indeed been carried out and the issue would not apply to a large number of Participants but in all cases observed it would have resulted in a fairer calculation of the Participant’s Credit Cover.

A Generator Member referred to Section G.12.17 regarding the issue of the timing of the email rescinding the CCIN and whether that would be captured in the Credit Report. The Proposer went through an example to provided assurance that the credit team would send an email to the Participant if there was a breach and the CCIN was to be rescinded but no changes were proposed to the Credit Report to avoid incurring vendor’s costs.

*Decision*

This Proposal was deferred.

**Actions:**

- Proposer to develop version 2 of this Modification in advance of the next meeting. - **Open**

**4. AOB/UPCOMING EVENTS**MARKET DEVELOPMENT UPDATE

The Presenter went through the slides and provided an update on Release F noting that there are currently 4 different Modifications each having a number of phases to go through. Currently the Modifications were in System testing and they would move shortly to User Acceptance testing. It was noted that the timing of the different phases is very tight and testing would run up to first week in October, in time

for the deployment as scheduled for the middle of October. Based on that programme, they are on target to achieve the deadline.

An Assetless Member questioned how much notice would be needed to reverse one Modification included in Release F in the context of Mod\_08\_20. The Presenter confirmed they would need to analyse how far they had gone and what testing has been done. Guidance from the vendor would be required before reversing it and there would be a need to understand where they are in the test cycle. Confirmation was given that in order to complete this analysis, a formal request would need to be made, as this is an unprecedented request and an estimate cannot be made.

Release G

It was advised that Release G has several important elements including the Re-price system, and noted that the scoping phase is already well advanced. There are currently conversations taking place on Mod\_03\_19 with the vendor in California on whether there is scope for inclusion in the release. Once there is confirmation on capacity, an update will be provided.

Upcoming Mods

There was no new update in this section.

The Secretariat thanked all for the attendance to Meeting 100 and noted that the next meeting will take place on Thursday, 22<sup>nd</sup> October 2020. Assurance was given that an Extraordinary Meeting would be convened as soon as possible.

**APPENDIX 1 – PROGRAMME OF WORK AS DISCUSSED AT MEETING 100**

<b>Status as at 20 August 2020</b>		
<b>Modification Proposals 'Recommended for Approval' without System impacts</b>		
<b>Title</b>	<b>Sections Modified</b>	<b>Sent</b>
Mod_01_20 PMEA No Energy Action Same Direction as NIV	E.3.4.2	Sent for RA decision – 17/07/20
<b>Modification Proposals 'Recommended for Approval' with System impacts</b>		
Mod_03_18 Autoproducer Credit Cover	G.12.4.4, G.14.7.3, G.14.7.3A, G.14.7.4, G.14.7.5, G.14.7.6, G.14.7.7 G.14.8.1, G.14.10.1, G.14.10.2, G.14.10.3, G.14.10.4, G.14.15.6 and G.15.1.1	Sent for RA decision 07/01/20
<b>Modification Proposals 'Recommended for Rejection'</b>		
N/A	N/A	N/A
<b>RA Decision 'Further Work Required'</b>		
N/A	N/A	N/A
<b>RA Decision Approved Modifications with System Impacts</b>		
Mod_03_19 Amended application of the Market Back Up Price if an Imbalance Price(s) fails to circulate V2	E.2.2.4 and E.5.1.3	Effective on System Implementation
Mod_10_19 Removal of negative QBOAs related to dispatchable priority dispatch units from the imbalance price	Part B Section D New Paragraph D.4.4.12	Oct 2020 (possible system implementation)
Mod_17_19 DSU State Aid Compliance Interim Approach	F and H	1 October 2020
Mod_19_19 Determining use of Complex Commercial Offer Data in Settlement when Required Information is not Available	F.3.3.2	Effective on System Implementation
Mod_20_19 Changing Day-ahead Difference Quantity to Day-ahead Trade Quantity in Within-day Difference Charge Calculations	F.18.5	Effective on System Implementation
Mod_21_19 Loss Adjustment Factor for Interconnectors	F	Effective on System Implementation
Mod_22_19 Correction of QUNDELLOTOL calculations to convert TOLUG and TOLOG to MWh	F	Effective on System Implementation
<b>RA Decision Approved Modifications with no System Impacts</b>		
Mod_05_20 Provisions for the Settlement of	Section H	1 October 2020

CEADSU		
<b>RA Decision Rejected</b>		
Mod_14_19 Interconnector Representation on the Modifications Committee	T&SC B.17.3, B.17.7, B.17.8 and Glossary AP12 3.7 and Appendix 1	30 July 2020
Mod_38_18 Limitation of Capacity Market Difference Payments to Metered Demand	F.20.1.1	12 November 2019
<b>AP Notifications</b>		
Mod_04_19 Running Indicative Settlement on all days	2.5.1	4 December 2019
Mod_04_20 Voting clarification and additional transparency	AP 3	16 July 2020
<b>Withdrawal Notifications</b>		
Mod_32_18 Removal of exposure for in merit generator units against BOA	Appendix N	05 July 2019
Mod_06_19 Determination of the Marginal Energy Action Price where no energy is available in the Net Imbalance Volume	Section E.3.4	17 October 2019
Mod_07_20 Balancing Modifications Committee Composition and constitution definitions	B.17.3 & AP12 3.7	10 July 2020
<b>Modification Proposal Extensions</b>		
Mod_03_18 Autoproducer Credit Cover	G4 to G15	Extension approved 04/07/19
Mod_13_19 Payment for Energy Consumption in SEM for non-energy Service Dispatch	T&SC Part A/Part B/Part C Appendices Part A/Part B Glossary Part A/Part B/Part C Agreed Procedures Part A/Part B	Extension approved 09/04/20
<ul style="list-style-type: none"> <li><b>Meeting 101 – 22 October 2020 – Conference Call</b></li> </ul>		

## APPENDIX 2 – COMMENTS RECEIVED

[ElectroRoute Comments](#)

[RA Comments](#)

[Chairperson & SSE Comments](#)