



## Single Electricity Market

### MODIFICATIONS COMMITTEE MEETING MINUTES

MEETING 101

CONFERENCE CALL

22 OCTOBER 2020

10.30AM – 1.00PM

---

#### COPYRIGHT NOTICE

All rights reserved. This entire publication is subject to the laws of copyright. This publication may not be reproduced or transmitted in any form or by any means, electronic or manual, including photocopying without the prior written permission of EirGrid plc and SONI Limited.

#### DOCUMENT DISCLAIMER

Every care and precaution is taken to ensure the accuracy of the information provided herein but such information is provided without warranties express, implied or otherwise howsoever arising and EirGrid plc and SONI Limited to the fullest extent permitted by law shall not be liable for any inaccuracies, errors, omissions or misleading information contained herein.

## Table of Contents

1.	SEMO UPDATE .....	5
2.	DEFERRED MODIFICATION PROPOSALS .....	7
	<b>MOD_13_19 PAYMENT FOR ENERGY CONSUMPTION IN SEM FOR NON-ENERGY SERVICES ....</b>	<b>7</b>
	<b>DISPATCH.....</b>	<b>7</b>
	<b>MOD_15_19 CLARIFICATION TO THE DESCRIPTION OF THE ROLE OF THE DISPUTE</b>	
	<b>RESOLUTION BOARD UNDER THE TSC .....</b>	<b>8</b>
	<b>MOD_06_20 REMOVING THE REQUIREMENT FOR A MONTHLY LOAD FORECAST .....</b>	<b>10</b>
	<b>MOD_10_20 RESCIND CCIN VIA EMAIL WHEN INDICATIVE SETTLEMENT IS DELAYED</b>	
	<b>AND SETTLEMENT TEAM CAN VERIFY METER VOLUMES.....</b>	<b>10</b>
3.	NEW MODIFICATION PROPOSALS .....	11
	<b>MOD_11_20 DEFINITION OF SUPPLIER MEMBER.....</b>	<b>11</b>
4.	AOB/UPCOMING EVENTS .....	13
	APPENDIX 1 – PROGRAMME OF WORK AS DISCUSSED AT MEETING 101 .....	13

**Document History**

Version	Date	Author	Comment
1.0	29 October 2020	Modifications Committee Secretariat	Issued to Modifications Committee for review and approval
2.0	5 November 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_15_19 Letter regarding Legal Advice request</a>
<a href="#">Mod_15_19 Legal Review</a>
<a href="#">Mod_15_19 Schedule 2 Consolidate Draft Section</a>
<a href="#">Mod_15_19 Schedule 2B Consolidate Mark up</a>
<a href="#">Mod_15_19 Schedule 3 Dispute Resolution Agreement</a>
<a href="#">Mod_06_20 Removing the requirement for a Monthly Load Forecast</a>
<a href="#">Mod_10_20 Rescind CCIN via email when indicative settlement is delayed and settlement team can verify volumes</a>
<a href="#">Mod_11_20 Definition of Supplier Member</a>

**In Attendance**

Name	Company	Position
<b>Modifications Committee (voting members)</b>		
Paraic Higgins (Chair)	ESB GT	Generator Member
Andrew Burke	IWEA	Supplier Member
Sean McParland	Energia	Generator Alternate
Robert McCarthy	Electricity Exchange	DSU Member
Ian Mullins	Bord Gais	Supplier Member
David Gascon	Bord na Mona	Generator Member
Bryan Hennessy	Naturgy	Supplier Member
Philip Carson	Power NI	Supplier Member
Stacy Feldmann	SSE	Generator Member
Alan Mullane	ElectroRoute	Assetless Member
<b>Modifications Committee (Non-Voting Members)</b>		
Grainne Black	CRU	RA Member
Adelle Watson	NIE Networks	MDP Member
James Long	ESB Networks	MDP Member
Karen Shiels	UR	RA Alternate
Gina Kelly	CRU	RA Alternate
Anne Trotter	EirGrid	TSO Member
Leigh Greer	UR	RA Member
Chris Goodman	SEMO	MO Member
Katia Compagnoni	SEMO	MO Alternate
Vivienne Price	SONI	TSO Alternate
Eamonn Boland	Brookfield Renewable	Supplier Alternate
Kevin Hannafin	Energia	Generator Member
Eoin Murphy	ElectroRoute	Assetless Alternate

<b>Secretariat</b>		
Sandra Linnane	SEMO	Secretariat
Esther Touhey	SEMO	Secretariat
<b>Observers</b>		
Wallace McKee	Power NI	Observer
Sinead O'Hare	PPB	Observer
Thomas O'Sullivan	Aughinish	Observer
Rochelle Broderick	Budget Energy	Observer
John Tracey	EirGrid	Observer
Niamh Delaney	EirGrid	Observer
Elaine Gallagher	EirGrid	Observer
Dillon O'Rourke	SEMO	Observer
Tomas Mahony	EirGrid	Observer

## 1. SEMO UPDATE

The Secretariat welcomed all to Modifications Committee Meeting 101. Secretariat went through the registration process for all Modification Meetings noting that a survey monkey link is provided in each invite and it is the responsibility of each Member to register and ensure there is a quorum. Secretariat noted that a substantial numbers of attendees either Members or Observers did not register, and for future meetings meeting materials will only be provided to those who have registered.

Secretariat welcomed Paraic Higgins our Chair elected for another term and the Vice-Chair Andrew Burke. Grainne Black from CRU was welcomed as the new RA Member.

### MOD\_08\_20 - RA Update

The RAs provided a brief update on the above Modification noting that as this matter was subject to legal proceedings, a discussion was not permitted in this forum. It was advised that ElectroRoute had been granted leave for a judicial review and that the relevant papers regarding those proceedings had not yet been served. It was noted that two injunctions were granted by the courts pending resolution of the issues raised in the judicial review proceedings. The first injunction granted prevents the taking of any steps to proceed with the implementation of Mod\_10\_19 and the second injunction granted prevents the taking of any steps to proceed with the deployment of Release F in so far as it relates to Mod\_10\_19 until such times as the judicial review is resolved or the injunctions are amended.

A Generator Member asked the RAs to repeat the update to fully capture the details to understand the situation.

A Supplier Member queried if only Mod\_10\_19 would be prevented from proceeding or if the whole of Release F would be halted. Secretariat reminded the Committee that legal matters could not be discussed any further as there were ongoing legal proceedings. A number of Members expressed concern about the impact that a delay to release F in its entirety would have on Market Participants and requested that market communications on this needed to be issued as soon as possible due to the implications for the market. Secretariat assured Members that the need for clear communications would be noted but reiterated that as

this was a legal matter and out of respect to both parties involved no commitments could be given as to what information could be made available and when. An RA Member also acknowledged this point.

A Generator Alternate asked if Mod\_10\_19 could be stripped from Release F allowing it to proceed without that piece of functionality. The RAs advised that this could also not be discussed. A Supplier Member queried the information provided in the Market Development update at Meeting 100 which advised that the functionality required for Mod\_10\_19 could be switched on and off, asking was this not still the case. Secretariat confirmed that this was the information communicated at Meeting 100, however as per the RA update it was not appropriate to discuss Release F in any further detail as this was now a legal matter. The RA member noted the importance of certainty in this matter for participants and suggested that an update be given when this was possible as things were moving quickly.

Secretariat explained that due to the above RA statement no Market Development update would be given at the meeting.

Secretariat advised that if Members had any queries in relation to the above to forward to [balancingmodifications@sem-o.com](mailto:balancingmodifications@sem-o.com).

The Chair recommended that discussions move to the next agenda item given the points raised in relation to the inability to discuss the subject further.

MOD_03_18 Autoproducer Credit Cover	<ul style="list-style-type: none"> <li>• SEMO to provide vendor impact assessment for existing proposal – <b>Open</b></li> <li>• RAs to provide a decision to either reject current Mod_03_18 or to recommend further work to be carried out - <b>Open</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>Closed</b></li> <li>• Secretariat to convene a Working Group in September / October 2020 – <b>Open</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>Closed</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>Closed</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_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</li> </ul>

	Meeting - <b>Closed</b>
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>
Mod_10_20 Rescind CCIN via email when indicative settlement is delayed and settlement team can verify meter volumes	<ul style="list-style-type: none"> <li>Proposer to quantify the current impact on over-collateralization to Participants is – <b>Open</b></li> </ul>

## 2. DEFERRED MODIFICATION PROPOSALS

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

The Proposer delivered a [presentation](#) on this Modification noting that it was raised with the main interest to reduce dispatch balancing costs. This was not just for wind farms but for a wider solution as there will be an increased need for such services in the future.

During an industry call which took place on 21<sup>st</sup> July 2020, four possible solutions were considered and following Modifications Committee Meeting 100 an action was taken against the Proposer to produce legal drafting for this Modification. The Proposer advised that two solutions were marked out as being worth further consideration but noted that one of them, which would be a more preferred and complete approach, would be difficult to design and implement therefore this particular change was not something that could be done in the short term.

A Generator Member clarified that the proposed interim approach reflected in the proposal could assign the energy being drawn for the service via a flag sent to settlement to reflect where the service was being provided thus providing for relief from Settlement charges in those periods. It was noted that there were a number of points for discussion around this approach which had been highlighted in the proposer's presentation.

The Proposer continued through the slides examining all of the issues that were raised for consideration with the remaining possible solutions. It was advised that all relevant charges would need to be considered so as not to expose any service providers. The Proposer relayed that there was a need to confirm how energy would be accounted for and discussions with Market and System Operators are ongoing to determine if this should be a separate line item in dispatch balancing costs report.

Potential Credit cover implications for the configuration proposed in the interim solution were discussed and the Proposer advised that this would be a question put to the Committee. It was also advised that there was a process for Maximum Import Capacity changes that may be necessary to refer to in both jurisdictions. The proposer advised that the TSO would need to check and complete an impact assessment for system implementation to produce and provide the flag indicating when a unit is in this mode and indicated that initial investigation showed that it should be possible by potentially further developing some existing functionality such as raising an alarm..

The Proposer confirmed that all of the issues had been given initial consideration and that there were some outstanding questions but the drafting has sought to reflect the current understanding. There was a belief that it would be useful to have a Working Group which would bottom out the final solutions allowing for a pathway to be given and a recommendation report would follow for the Modification.

A Generator Member and a Supplier Member both agreed with the suggested steps forward via a Working Group to progress this Modification. It was suggested that the scope of the Working Group should include not just solution 1 and 4 but rather be open to consideration of other potential solutions. Solution 3 was a possible solution also in their view. The Proposer was in agreement with maintaining the scope open and

---

confirmed that any other suggestions would not be excluded including any new suggestions. A Generator Alternate echoed the notion that Solution 3 should be open to discussion. Although it requires consultation and RA approval the costs are small in comparison to system impact costs of other solutions. It was asked why it was ruled out if the quantum of impact wouldn't have a significant impact. It was noted that it may not be a final solution but it was a good interim one. However the chair commented that there was a risk of replaying the previous Working Group. A lot of work had been going on in the background and going back to solutions that had been excluded would mean taking the focus away from the ones that have been assessed as more achievable.

Secretariat noted that a Working Group could be supported and encouraged Members to contact the Proposer with any comments or queries and this will allow for the Terms of Reference to be drafted and scoped adequately.

A DSU Member voiced an issue with the legal drafting for this Modification advising that the way it had been drafted meant if the flag were applied to Trading Site Supplier Units for DSUs this would have unintended consequences and further work needed to be done to amend this. It was advised that DSU cannot provide reactive power and would not therefore be affected by this and another solution may have to be discussed for any other services in the longer term.

DSU Member stated that there was a process in drafting that the System Operator will create a flag but the actual description of when the flag will have a value of one or zero was not given and although that flag was not applied to DSU Trading Site Supplier Units at the moment, it would make sense to future proof the rule for other services. The Proposer noted that this was an interim suggestion and it will allow capability for reactive power in the first instance. It was advised that it was important to make that distinction between the proposed interim solution and any broader longer term approach which cannot be accounted for at this point in time.

The Chair agreed to keeping the Terms of Reference well defined and to not waste time going back over old options whilst staying on the path to the interim and longer term solutions. It was suggested that in order to keep the scope narrow, questions, issues and comments must be highlighted before the Working Group so that these can be considered by the proposer and Members in advance.

The SEMO Member suggested that a questionnaire could be circulated to Members before the Working Group which would prompt a response thus ensuring an efficient Working Group process. Secretariat agreed to work with the Proposer to circulate an email where there is a platform for questions and comments to be raised.

### **Decision**

---

This Proposal was deferred.

#### **Actions:**

- Proposer and Secretariat to work on email with questionnaire to prompt proactive engagement - **Open**
- Secretariat to produce a Terms of Reference and advise Members of dates available to host a Working Group – **Open**

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

RAs provided a background on this Modification noting that legal advice was requested by the Committee following a version 2 of this proposal, and has now been circulated for review. The RAs advised that there was a need to address and clarify the role of DRB and clarify the intent within the Code. Following this

---

discussion on the legal advice issued, the RAs would then produce a version 3 of this proposal for Modifications Meeting 102 on 3<sup>rd</sup> December 2020.

A Supplier Member questioned if there was a need for a version 3 to be put forward as this issue occurred early on in the new market and hasn't occurred since. The reply was that the events that occurred highlighted an unintended consequence of the original drafting that could reoccur if not appropriately addressed and the legal advice received confirms that view.

It was advised that there were good improvements on transparency in terms of publication of DRB decisions and they would still like to progress with the Modification which at present needs to be updated with the proposed legal drafting changes.

A SEMO Observer advised that although a certain amount of time had passed without any occurrences of the issues that prompted the proposal this did not mean that this would not happen again. It was noted that it was up to the Committee to consider the role of DRB and the steps the DRB needed to take to ensure transparency. The provisions of the Code could not be undermined and it was appropriate to consider this issue.

A Generator Member gave support to the option regarding transparency publications. A Generator Member expressed concern with the removal of wording regarding disputes being resolved on an equitable basis. They advised that they felt that the provision for resolution on an equitable basis is an important feature for DRB and to remove it is very fundamental. The Generator Member voiced a concern that these version appears to limit the role of DRB and that the wording arrived at during the initial drafting of the Code must have been deliberate in including this. An RA Member noted that, while they were not involved in the original drafting and cannot provide a rationale of why the term equitable was included, the RAs are of the view that this is what led to the DRB applying resolutions outside of the provisions within the Code which is not appropriate. This is what led them to raise the Modification in the first place and it is supported in the advice provided.

A discussion ensued on the term equitable and how it caused confusion with relation to where the scope of the role of the DRB. A Generator Member expressed concern that removal of the term could limit the capability of the DRB to provide mechanical remedy such as resettlement or repricing within the Code indicating that they felt that this was not appropriate. A SEMO Observer advised that they did not agree on this point and spoke in support of the DRB only being able to provide remedy under the Code as being the appropriate approach. In fact the changes are not limiting the DRB but are preventing the DRB from over-reaching and going beyond its remit and these clarifications only re-apply the original intent and purpose of the DRB.

DSU Member supported the points raised by made by other Members highlighting that the point regarding transparency would definitely be of benefit. An idea to split the four points out was proposed by a Generator Member advising that the point regarding provision of transparency could stand alone and the other three could be grouped together separately as they require further debates. A Generator Alternate had questions about the independent legal advice issued regarding the clarification of the DRB role. It was asked if a Q&A session could be set up with those who provided the legal advice. Secretariat reminded the Committee that this was not within the scope of the legal advice and no further interaction with the external legal counsel was agreed to previously.

The RAs advised that if there were still concerns regarding the above that these could be expressed to the RAs before v3 of this proposal is submitted. It was agreed that any questions could be forwarded to the RAs by Monday, 9<sup>th</sup> of November 2020.

### **Decision**

---

This Proposal was deferred.

---

**Actions:**

- Members to Direct any queries or comments by 12.00pm, Monday 9<sup>th</sup> November to RAs – **Open**
- RAs to submit a version 3 or consider a possibility of 2 modifications to progress the Transparency provisions and other provisions before the next meeting - **Open**

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

SEMO provided a brief update on this Modification noting that the Monthly Load Forecast was now published directly on the website. There is a consideration that this report can be removed completely based on whether there is no need for it which will be informed by Members once secondary trading is implemented on 26<sup>th</sup> October and they have therefore had a chance to consider whether it is useful for that purpose. SEMO noted that by December Members will have had a chance to consider the merits of the report so that the proposal to remove it could be discussed further but this could not be done until secondary trading comes in.

***Decision***

---

This Proposal was deferred.

**Actions:**

- Members to confirm need for this report following implementation of Secondary Trading - **Open**

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

The Proposer introduced the Modification noting that version 3 was issued for consideration. This new Modification was raised to try to alleviate over-collateralization where indicative Settlement run is delayed. The Proposer noted where changes would be made to the glossary and where further updates would be required.

Going through the [presentation](#), the Proposer explained the examples which provided a context of the delays which occurred. It was confirmed that these delays were caused by internal processing and additional days were included in the calculation of Credit Cover requirements as a result. The presentation also highlighted a minor change which would be captured in the FRR should the Modification be voted on.

A Generator Alternate asked about trading exposure in relation to the second example in the presentation. The Proposer went through the example confirming that this Modification was aiming to negate additional days regardless of the sign of the amount.

A number of Members and Observers pointed out that removing the CCIN helped but did not get to the core of the problem. The Proposer agreed with this and the purpose of this Modification was just to offer some relief in a manner that could be implemented easily and promptly. It was noted that System Operators data was included in this version of the Modification to cover all data that could affect delays. A Supplier Member also pointed out that one of the issues was the fact that metered generation was not sent for the first few weeks for new Units and previously there had been indications that this would be addressed.

An ROI MDP Member assured the Committee that through engagement with the Proposer a new process had been put in place and for any new units they will let the unvalidated data flow as soon as they are effective into the market.

---

**Decision**


---

This Proposal was Recommended for Approval.

Recommended for Approval by Unanimous Vote		
Paraic Higgins (Chair)	Generator Member	Approve
Andrew Burke	Supplier Member	Approve
Sean McParland	Generator Alternate	Approve
Robert McCarthy	DSU Member	Approve
Ian Mullins	Supplier Member	Approve
David Gascon	Generator Alternate	Approve
Bryan Hennessy	Supplier Member	Approve
Philip Carson	Supplier Member	Approve
Stacy Feldmann	Generator Member	Approve
Alan Mullane	Assetless Member	Approve

**Actions:**

- Secretariat to draft a Final Recommendation Report including minor amendment as presented by Proposer- **Open**

### 3. NEW MODIFICATION PROPOSALS

#### MOD\_11\_20 DEFINITION OF SUPPLIER MEMBER

- The RAs provided a brief summary of the discussions that lead to this Modification noting that there were three elements to be considered some still outstanding with an aim to raise them in the December meeting: The potential addition of one new Generator seat and one new Supplier seat - This was considered and did not proceed in light of the results of the 2020 election which failed to fill all of the Suppliers seats available.
- How Interconnectors can be represented - It was advised that a second Modification had not been produced as there were discussions ongoing on how Interconnectors can be represented. The RAs welcomed comments on this.
- Definition of Supplier – this is the subject of Mod\_11\_20 which aim to take into consideration previous comments received on the representation of Suppliers on the Panel and would not take place until the next Member's election.

A Supplier Member raised concerns that this Modification was discriminatory against self-supply units at a time where more and more demand type units are planning to enter the Market, such as large Data

---

Centers, in the near future. It was felt that this Modification was making representation less inclusive, did not give the correct signals and did not reflect the previous discussions on the matter.

A DSU Member voiced the same concern advising that if this Modification was approved a significant number of megawatts may end up not being represented. It was noted that one of the initial concern was that Interconnectors were not adequately represented, but approving this Modification would cause the same issue with some demand customers not being represented. There was an agreement from a number of other Generator and Supplier Members with the points raised and it was noted that this definition would make it more difficult to find Members eligible for election and that Participants should be allowed to vote for whom they wish to be represented by. Also questions were raised as to why this Modification was being rushed as opposed to the other outstanding items regarding the Panel composition.

The RAs agreed to take all of the points on board and assured the Committee that this Modification was not being rushed as it would not be effective until the next election. It was their aim to process any changes to assist in revising the Modification.

A discussion began around the glossary definition of a Supplier and why this Mod introduces a different one. SEMO noted this was because the Supplier definition in itself is not changing, the Modification only addresses representation to the Panel. A consideration could be made on how new entities would be represented going forward in a similar fashion to the process that lead to new DSUs and Assetless Members. A Supplier and DSU Members refuted stating that the generic Generator/Supplier category should suffice and advising that when DSU Membership was being put forward, DSU units were already represented by Generators and a case was brought forward on how the two differ; this Modification instead would exclude a large part of Demand Users that are already entering the Market.

A Supplier Member stated that, although the drive behind the RAs approach was understandable, the definition should not be looked in isolation so that no customer is excluded.

Another Supplier Member noted that the Working Group had highlighted the need for an additional Generator and Supplier seat plus a new definition for a dedicated Renewable seat.. A question was raised if this was something that should be brought forward by Participants themselves or RAs.

The RAs advised that it was the intention not to exclude any of the previous suggestions but in the context of the latest elections, it didn't seem appropriate. Also concerns had been raised by the fact that if there were to be a ring-fenced Renewable seat, that would stop a Participant from holding a Generator seat. The RAs confirmed that this was not brought forward because there was uncertainty around how much consensus there was in this.

A Supplier Member advised that the above had been discussed at length previously and the priority was to capture the right Participants noting that definitions need to be fair and inclusive.

SEMO Member asked if the main issue was with the phrase '*multiple end consumers*' and if a definition which also took into consideration sites with single consumers would be acceptable. DSU Member asked if '*end consumer*' was intended to be a defined term as it is not currently included in the Glossary. A Supplier Member added that maybe the focus should be on Demand behaviors as opposed to defining by exclusion.

The Assetless Member asked the RAs why they thought residential and commercial demand customers are under-represented. The RAs advised that they wanted to get the correct balance, they see no difference on whether a Suppliers have one or multiple customers as Demand is represented as an aggregate, as noted by other comments; however, there was a different impact of the charges as they are applied to different types of Supplier units and therefore the concern is around how the issues are considered and voted on. Assurance was given that new Supplier seats would not be added without balancing and adding other Generator seats.

The Chair summarized that this Modification would not be voted on at this meeting but suggested an industry call may be of benefit instead of another Working Group to tease out further ideas and comments. The Secretariat agreed with this proposal advising that a solution needed to be reached on this and they

could facilitate circulation of written scope and questions so that there would be a record of the discussion which wouldn't be minuted as a regular Working Group would.

RAs also agreed with proceeding with an industry call and confirmed that this Modification could be withdrawn with a number of issues to be brought to the call with a purpose of getting detailed feedback before new Modifications can be raised on this and the other outstanding items concerning the Panel composition and representation.

**Decision**

This Proposal was withdrawn.

**Actions:**

- Proposer to arrange industry call and send an email to Participants to provide comments for discussion – **Open**
- Secretariat to draft Withdrawal Notification – **Open**
- RAs to issue a summary note in preparation of upcoming industry call – **Open**
- RAs to issue a summary note and outcomes following industry call – **Open**

**4. AOB/UPCOMING EVENTS**

SEMO provided an update on new Modification proposals in the pipeline. They would be raised separately on the below:

- Potential issue on how Recoverable Starts Up Costs are determined;
- Charges that apply where a unit under test trips.

Secretariat noted that Modifications Committee Meeting 102 would be held on Thursday, 3<sup>rd</sup> December 2020 and deadline for new submission is the 19<sup>th</sup> November.

**APPENDIX 1 – PROGRAMME OF WORK AS DISCUSSED AT MEETING 101**

Status as at 22 October 2020		
Modification Proposals 'Recommended for Approval' without System impacts		
Title	Sections Modified	Sent
Mod_01_20 PMEA No Energy Action Same Direction as NIV	E.3.4.2	Sent for RA decision 17/07/20
Modification Proposals 'Recommended for Approval' with System impacts		
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,	Sent for RA decision 07/01/20

	G.14.15.6 and G.15.1.1	
<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 CEADSU	Section H	1 October 2020
<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

Mod_09_20 Number of days for Interest Calculation	AP 15	5 October 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 102 – 3 December 2020 – Conference Call</b></li> </ul>		