

# Single Electricity Market

MODIFICATIONS COMMITTEE MEETING MINUTES

MEETING 107 CONFERENCE CALL 21<sup>ST</sup> OCTOBER 2021 10.00AM – 2.00PM

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# Table of Contents

I

1.	SEMO UPDATE	5
2.	URGENT MODIFICATION PROPOSAL	6
MOD_	_18_21 TEMPORARY DEROGATION FROM SEMO CHARGES RELATED TO MOD_02_21.	6
2.	DEFERRED MODIFICATION PROPOSALS	9
MOD	_07_21 DISPATCHABLE DEMAND GENERATOR UNIT 2021	9
MOD_	14_21 EXTENSION OF SYSTEM SERVICE FLAG TO INCLUDE UNITS PROVIDING REPLACEMENT RESERVE IN LINE WITH THE DETAILED DESIGN	10
MOD_	_15_21 ALTER CDIFF SECTION F.18.7.2	11
3.	NEW MODIFICATION PROPOSALS	12
MOD_	_17_21 SECOND HOUSEKEEPING 2021	12
4.	AOB/UPCOMING MODIFICATIONS	13

# **Document History**

Version	Date	Author	Comment
1.0	28 <sup>th</sup> October 2021	Modifications Committee Secretariat	Issued to Modifications Committee for review and approval
2.0	4 <sup>th</sup> November 2021	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
Balancing Market Rules – Trading and Settlement Code & Agreed Procedures
Mod_07_21 Dispatchable Demand Generator Unit 2021
Mod_14_21 Extension of System Service Flag to include units providing Replacement Reserve in line with the detailed design
Mod_15_21 Alter CDIFF Section F.18.7.2
Mod_17_21 Second Housekeeping 2021
Mod_18_21 Temporary derogation from SEMO charges related to Mod_02_21

# In Attendance

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Name	Company	Position	
Modifications Committee (voting members)			
Paul McGuckin	Moyle Interconnector Ltd	Flexible Participant Member	
Sean McParland	Energia	Generator Alternate	
Andrew Burke (Vice Chair)	Wind, Energy Ireland	Renewable Generator Member	
James Gallagher	Flogas	Supplier Alternate	
Colm Oireachtaigh	PrePayPower	Supplier Member	
Robert McCarthy	Electricity Exchange	DSU Member	
David Gascon	Bord na Mona	Generator Alternate	

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lan Mullins	Bord Gais Energy	Supplier Member
Patrick Larkin	ElectroRoute	Assetless Member
Jag Basi	ESB	Generator Alternate
Bryan Hennessy	Naturgy	Supplier Member
David Caldwell	Power NI	Supplier Alternate
Stacy Feldmann	SSE	Generator Member
Modifications Committe	ee (Non-Voting Members)	
Nick Heyward	Energy Storage Ireland	Flexible Participant Alternate
Brigid Reilly	PrePayPower	Supplier Alternate
Julie Ann Hannon	Bord Gais Energy	Supplier Alternate
Cormac Daly	Tynagh Energy	Generator Member
Katia Compagnoni	SEMO	MO Member
Martin McCarthy	SEMO	MO Alternate
Keith Plunkett	ESB Networks	MDP Alternate
Adelle Watson	NIE Networks	MDP Member
Anne Trotter	EirGrid	SO Member
Karen Shiels	Uregni	RA Alternate
Leigh Greer	Uregni	RA Member
Gina Kelly	CRU	RA Alternate
Grainne Black	CRU	RA Member
Secretariat		
Sandra Linnane	SEMO	Secretariat
Observers		
Paul McNulty	Uregni	Observer
Thomas O'Sullivan	Aughinish	Observer
Sinead O'Hare	Power NI	Observer
Conall Heusaff	CRU	Observer
Paul Hutchinson	EPUKI	Observer

Eamon Garrigan	EirGrid	Observer
Elaine Corcoran	EirGrid	Observer
Christopher Goodman	EirGrid	Observer
Catherine Byrne	EirGrid	Observer
John O Dea	EirGrid	Observer
Martin Kerin	EirGrid	Observer

# 1. SEMO UPDATE

The Secretariat welcomed all to Modifications Committee Meeting 107. During the week the RAs sent notification that the remaining 2 Supplier seats were filled. Rochelle Broderick (Budget Energy) with James Gallagher (Flogas) and Colm Oireachtaigh (PrePayPower) with Bridget Reilly (PrePayPower) were welcomed to the Committee. Martin McCarthy was also welcomed to the Committee as an MO alternate. It was noted that Modifications Committee Meeting 107 would be the last Modifications Meeting for Gina Kelly of CRU and both SEMO Member and the Vice Chair gave their thanks for her support and guidance during her time on the Committee. It was noted that Conall Heussaff would take up the CRU Alternate seat as of Meeting 108.

Secretariat noted the minutes for Modifications Meeting 106 were read and approved. Version 24.0 of the T&SC was published this week and as a result only 5 Modifications remain on the baseline. It was noted that Version 25.0 of the Code would be issued following the next system release before Christmas. The RAs noted that there was no update on the remaining two Modifications awaiting a decision.

#### Market Development Update

An update was provided on the release program with notification that there would be further information on Release I at the next meeting. It was advised that as noted in the recent MOUG, Release H is completing the last phases of testing and there were 4 changes due to approved Modifications to go through with Mod\_02\_21 Setting a Flag for Interconnector Actions implemented in an additional patch to be released after deployment of Release H. It was advised that factory testing was in progress for Release H and most of the Modifications are over the line.

MOD_13_19 Payment for Energy Consumption in SEM for non-energy Services Dispatch • Market Operations to progress request for Impact Assessment – <b>Open</b>	MOD_13_19 Payment for Energy Consumption in SEM for non-energy Services Dispatch	
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MOD_17_19 DSU State Aid Compliance Interim Approach	• 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 - Long Term Action
MOD_02_21 Setting a Flag for Interconnector actions above 500/Mwh	<ul> <li>SEMO to provide impact assessment – Closed</li> </ul>
Mod_06_21 Proposing Invoice improvements to reduce burden on Market Participants	<ul> <li>Proposer to consider if the trial addresses concerns at the centre of their Modification and potentially withdraw or engage with an updated version to address the issues raised by the MO – Closed</li> </ul>
Mod_07_21 Dispatchable Demand Generator Unit 2021	<ul> <li>SEMO to include this proposal into overall Working Group on the progression of batteries – Open</li> </ul>
Mod_08_21 Removing the 10MW limit for some Demand Sites to enable Demand Sites that include, or are, an individual battery storage unit > 10MW to participate as part of a Demand Side Unit (DSU)	<ul> <li>Secretariat and Proposer to work with new contact for batteries and SEMO for alternative solutions – OpenClosed</li> </ul>
Mod_14_21 Extension of System Service Flag to include units providing replacement reserve in line with the detailed design	<ul> <li>SEMO to provide further explanation on how the flag is currently set for replacement reserve – <b>Open</b></li> <li>Proposer to consider legal drafting to include a limb 3 in the clause - <b>Open</b></li> </ul>
Mod_15_21 Alter CDIFF Section F.18.7.2	<ul> <li>Proposer to convene an Industry Call to discuss concerns and comments raised at Meeting 106 - Open</li> <li>Proposer to submit a version 2 of this proposal before Meeting 107 - Open</li> </ul>

# 2. URGENT MODIFICATION PROPOSAL

# MOD\_18\_21 TEMPORARY DEROGATION FROM SEMO CHARGES RELATED TO MOD\_02\_21

The Proposer updated the Committee on this Modification Proposal and as there were new Members to the Committee, provided a background on the proposal. It was advised that this was a follow up to Mod\_16\_21 'Temporary use of the Market Backup Price where an Interconnector Trade Quantity and Price are submitted'. Prior to that, Mod\_02\_21 'Setting a flag for Interconnector Actions' had been approved by the SEM Committee on 12 August 2021 and because it required system changes it would not be effective until after these changes were implemented in the Market systems. It was noted that during September there were a number of SO-SO trades that had such a significant impact that prompted the MO to put some of the settlement charges on hold. Mod\_16\_21 was then raised to prevent such events in the intervening period until Mod\_02\_21 would be implemented in the systems. The current Modification, Mod\_18\_21, seeks to address the material charges that occurred after the approval of Mod\_02\_21 and prior to the implementation of Mod\_16\_21.

The change will be made to Section H of the code to allow the RAs to afford derogation on foot of a MO request based on the material impact of the charges related to those events during the specified time

period. It was noted that at present there have been comments requesting clarity on the legal drafting and the discretion in decision making given how limb (c) was currently drafted. The Proposer explained that the intent of the Modification is that the assessment of materiality would be done in relation to the totality of charges incurred in the market, not on trading day or period basis or unit basis -either. The intent of this proposal was to cover Non-Performance Difference Charges (CDIFFCNP). It was advised that the legal drafting may need to be reworded to clarify this point.

DSU Member gave thanks for the drafting of this Modification but felt overall that if the price is deemed wrong they should be looking at solutions to pricing rather than invoicing. A further DSU specific point was made that under interim State Aid approach DSUs where subject to charges related to the Strike Price being exceeded similarly to Standard Generator Units. It was questioned if the value of such Charges (CEADSU) should also be included. The RAs responded to the first query noting that a number of different approaches were considered but the reason for not putting them in process is because they have a degree of retrospectivity which is not applied to the approach proposed as the charges involved are yet to be invoiced. It was also felt that the invoicing approach was more targeted. DSU was asked by SEMO Member if they had been invoiced for the CEADSU charges. It was advised that due to a defect in the system, these amounts were not invoiced; the defect is due to be fixed in Release H. SEMO Member agreed that in their opinion those charges should form part of the exemption contemplated by the Modification and they would seek to include them in the request for derogation.

An Assetless Member noted his concern with this Modification advising that the previous Modification Mod\_02\_21 was not effective yet and all Participants had traded accordingly. It was believed that if this Modification was passed through changing the rules it would set a dangerous precedent, erode the confidence in the auction setting and open the door to changes to any unwelcomed market price.

SEMO responded noting that the decision to put charges on hold was not due to the observation of high prices, but due to the disproportionate impact of some of the related charges and subsequent credit requirements. This was a prudent decision to allow the discussion to take place in light of the decision that had already taken place for Mod\_02\_21. Assurance was given that this was not a precedent likely to be repeated as not many Modifications needing Market changes would have such a widespread and significant impact.

The Assetless Member noted that if this Modifications was approved, it would not fix why these prices are happening and that there is a market failure that need to be addressed and over-insulating Generators is not the right answer.

The Proposer also added that there were 3 criteria in the legal drafting that would make this unlikely to be repeated and it is an unusual situation that these charges happen to be so highly material. The modification also does not represent a distraction or impediment to any more fundamental changes that may be deemed necessary.

A Supplier Member stated that there was no market failure in I-SEM but in their opinion that failure is happening in GB where the market coupling changed overnight. I-SEM appears to give a large protection for the Irish consumer.

It was questioned by a Supplier Alternate if there would be an opportunity for participants to query the decision that will be made by the SEMC on foot of this Mod regarding amounts in invoices they do not receive and if there must be universal acceptance of the SEMC decision by all affected participants for the decision(s) to stand for any one entity, and of there was a risk that these amounts could be included in M+4 or subsequent re-runs. SEMO advised that the Modification deals with the totality of the Market and so they see no need for individual levels of approval by all those affected for the decision to stand for any one affected entity. Any invoices would issue after the SEMC decision. A Supplier Alternate also\_queried whether there was a risk that these amounts at any future re-run. Assurance was also given that Participants can use Report 44, which would have an amount relating to Stop Losses, that Participants could use to help calculate their own materiality and verify amounts in any invoices issued.

The Proposer provided further assurance that the application from SEMO and the decision would be published. The Proposer then moved to the legal drafting piece and noted that there would be a slight rewording to add the terms 'in totality' to explain the materiality referred in limb c).

A Supplier Member queried if there was comfort within the socialization fund for this change and would the outcome of this be sufficient. The Proposer provided assurance that this had been looked at and SEMO confirmed they will include the figures in the derogation request. If these charges were collected it was advised that the socialization fund would come in 3 times the recommended amount for the fund. It was advised that the total amount on hold was in the region of over €25 million.

A Generator Member asked about timelines. SEMO advised that following the meeting, minutes and a FRR would be sent out with an expedited timeframe as per urgent Modifications requirements and it is expected that the SEMC would also look at providing a final decision promptly. It is acknowledged that this is very relevant due to a number of disputes currently opened and due to be heard by the DRB. A request for derogation could be submitted <u>from SEMO</u> to the RAs as early as the beginning of November.

### Decision

This Proposal was Recommended for Approval.

Recommended for Approval by Majority Vote			
Paul McGuckin	Flexible Participant Member	Approve	
Sean McParland	Generator Alternate	Approve	
Andrew Burke (Vice Chair)	Renewable Generator Member	Approve	
James Gallagher	Supplier Member	Approve	
Colm Oireachtaigh	Supplier Member	Approve	
Robert McCarthy	DSU Member	Approve	
David Gascon	Generator Alternate	Approve	
Ian Mullins	Supplier Member	Approve	
Patrick Larkin	Assetless Member	Reject	
Jag Basi	Generator Alternate	Approve	
Bryan Hennessy	Supplier Member	Approve	
David Caldwell	Supplier Alternate	Approve	
Stacy Feldmann	Generator Member	Approve	

Actions:

- Secretariat to draft minutes on Mod\_18\_21 and issue to Committee within 24 hours Open
- Proposer to confirm the correct legal drafting amendments Open
- Secretariat to draft a Final Recommendation Report and circulate in parallel with the minutes to the RAs for decision – Open

## 2. DEFERRED MODIFICATION PROPOSALS

#### MOD\_07\_21 DISPATCHABLE DEMAND GENERATOR UNIT 2021

EirGrid delivered a <u>presentation</u> on the Flextech project which is linked to the development of Mod\_07\_21 and advised that this project was about technology enablement and removing barriers for new technology.

EirGrid went through the slides advising that this was a multi-year project which would change across multiple systems. However some projects could lend themselves to interim solutions which are what has been explored with Batteries, with a detailed document of the approach taken being published before Christmas. This type of approach could also potentially be used for the Dispatchable Demand project at the center of Mod\_07\_21.

The Proposer of Mod\_07\_21 agreed that the above was a sensible approach and although it will take years to have final enduring solutions it was good that an interim solution is being explored. It was queried if there was a risk that a solution would be found and then it gets rejected by the panel. EirGrid agreed that full approval could never be guaranteed in advance, however with the right level of industry involvement any potential issues should be highlighted and addressed in a timely manner.

A Flexible Participant advised that industry involvement in the process was very important and that would provide answers to all of the questions before there is a vote from the Committee. EirGrid agreed noting that various form of engagements are being considered as a way to get industry on board.

The Proposer of Mod\_07\_21 noted that this Modification was ambitious and aimed at providing support to existing technologies, wind in particular. It's viability in the next phases would depend on the removal of supplier charges or imperfection charges that may apply.

RA Member noted that this project was quite timely but advice was given to be mindful of the Regulator interaction as early as possible, as the RAs would need time to consider changes in the area of tariffs and licensing. The idea of focus groups had already been prompted by the RAs where these types of discussions could be raised and SEMO Capital Programme could be considered.

EirGrid took an action to contact the RAs regarding these focus groups and who are the people to contact. A DSU Member agreed that this was this was a good way forward and that any process needed full industry engagement including RAs from an early stage. A concern around scope and what is being looked for was raised and agreed that a Working Group could address these concerns.

A number of the Members queried the timelines for this Working Group. Secretariat noted that the remainder of the year would be too busy to schedule a Working Group and next year would be more feasible.

It was agreed by all that it would not be wise to vote now as they would be voting on principle only which is not the purpose of the Committee; also some requests from the Proposer with regards to tariffs are outside the remit of the Committee as they are regulatory matters. The Proposer of Mod\_07\_21 agreed and believed that it was best to withdraw this Modification with a view to submit a more specific Modification in the future.

#### Decision

This Proposal was withdrawn.

#### Actions:

- EirgGrid to discuss further with the RAs about focus groups and the necessary attendees at these events **Open**
- EirGrid to schedule industry interactions in 2022 Open
- Secretariat to draft a Withdrawal Notification Open

# MOD\_14\_21 EXTENSION OF SYSTEM SERVICE FLAG TO INCLUDE UNITS PROVIDING REPLACEMENT RESERVE IN LINE WITH THE DETAILED DESIGN

The Proposer delivered a <u>presentation</u> on this Modification noting that there would be some formatting alterations to the legal drafting as included in the slide pack. Giving a background on this Modification the Proposer noted that the high level design was very clear and units that are providing replacement reserve should not be exposed to penalties.

A Generator Alternate thanked the Proposer for the clarity given by the presentation and also provided sympathy for the apparent discrimination which was occurring. It was advised that in terms of what was proposed there should be an attempt to implement the high level design and from the slides presented it didn't look like this is what was being done. It was suggested that this Modification highlighted the problem but the solution offered may not be the correct one.

It was noted by a Generator Member that flexible units should be protected against the scenarios highlighted. Clarity was requested on the matter of the application of the system service flag by the TSO particularly with regards to this being applied a lot less in NI. SO Observer provided an overlook of the application of the system flag for Replacement Reserve Units explaining that it is different from other Reserve Types and flag is only applied when the whole amount available from all Generator Units included in the weekly CGT Operational Constraints is scheduled. It was advised that the issue with units was happening both in the North and South and the flag was not binding as much in NI due to the characteristics of the NI portfolio.

A Supplier Member queried that if flagging is not achieving the high level design is it a systems issue or a interpretation issue? A concern was raised that the high level design wasn't being implemented. It was noted that both issues of high level design and system implementation could be fixed at the same time with this Modification. An SO Observer advised that the change would not be easy as calculations needed to be done in a dynamic way and prices are not known at the time when scheduling is done. It was noted that further impact assessment was needed.

A Generator Member agreed with the point above that the flag was not applied and units were exposed unfairly. SO Member advised that they have been looking at ways to incorporate the changes to avoid those units which are not available gets charged.

A DSU member echoed the views made previously by Flexible Participant Alternate regarding the design should protect fast acting units and availability is already taken into account in the calculation so that should satisfy the concerns of the TSOs that only available units will not get charged. It was felt there were 2 issues at play noting that rules don't flag units and materials don't reflect dynamic actions.

A Generator Member suggested if EirGrid could provide a comprehensive report on Replacement Reserve which could be used to look at settlement for price events.

The RAs provided an overview of their position stating that they had engaged with the Proposer SEMO and the TSO and an ex-post solution via Settlement has also been explored; however if that were to be the case the RAs stressed out that they would be keen to see an added condition where the unit being exempt from the charges would be in merit either against the Strike Price or against the Imbalance Price to maintain the incentives on bidding appropriately.

SEMO advised they had been looking at temporary manual solutions in Settlement where there is some flexibility to modify the flag as long as there is clarity on the criteria to be applied. It was advised that this could be a manual process in the interim and at the same time the impact assessment could be developed for an enduring solution and the criteria to apply the flag agreed.

A Generator Member echoed the concerns of other Members and felt that this Modification was too much of a free pass and should not be a default option.

It was suggested that the Modification could be voted on with approval to include the drafting that it would only apply when units are in merit. The Proposer provided clarification that in their opinion being in merit would refer to units bidding below the balancing price rather than the strike price.

A number of Members voiced concerns over voting on this Modification noting there were still issues to be ironed out. A reference was made to Mod\_32\_18 and the discussions held at the time around what in merit should mean especially with units with multiple bids. Also the terminology around availability should be specified as there are a number of availability variable and the Mod needs to include the correct terms.

The Proposer noted all of the comments made above and agreed to grant further discussion in order to draft a version 2 of this Modification. An agreement was made to hold an Industry call jointly with SSE on Mod\_15\_21 which touches on similar items and which will be held in November on a date to be confirmed.

#### Decision

This Proposal was deferred.

#### Actions:

- Proposer to schedule an industry call to discuss this Modification and Mod\_15\_21 further Open
- Proposer to draft a version 2 of this Modification for Meeting 108 **Open**

#### MOD\_15\_21 ALTER CDIFF SECTION F.18.7.2

The Proposer provided and update on this Modification noting that an Industry Group would be held shortly with a date to be agreed with SSE and EPUKI. Mod\_14\_21 would also be discussed within this Industry Call.

#### Decision

This Proposal was deferred.

#### Actions:

 SSE and EPUKI to agree on a date to hold this Industry Call for Mod\_14\_21 and Mod\_15\_21 -Open

# 3. NEW MODIFICATION PROPOSALS

#### MOD\_17\_21 SECOND HOUSEKEEPING 2021

The Proposer of this Modification gave a brief summary of the proposal noting the the changes proposed should be considered very straightforward. It was advised that there was an error in V23 final baseline where one paragraph was deleted by mistake. There were also incorrect references found which needed to be removed.

#### Decision

This Proposal was Recommended for Approval.

Recommended for Approval by Unanimous Vote			
Paul McGuckin	Flexible Participant Member	Approve	
Sean McParland	Generator Alternate	Approve	
Andrew Burke (Vice Chair)	Renewable Generator Member	Approve	
James Gallagher	Supplier Member	Approve	
Colm Oireachtaigh	Supplier Member	Approve	
Robert McCarthy	DSU Member	Approve	
David Gascon	Generator Alternate	Approve	
Ian Mullins	Supplier Member	Approve	
Patrick Larkin	Assetless Member	Approve	
Jag Basi	Generator Alternate	Approve	
Bryan Hennessy	Supplier Member	Approve	
David Caldwell	Supplier Alternate	Approve	
Stacy Feldmann	Generator Member	Approve	

#### Actions

• Secretariat to draft a Final Recommendation Report - Open

# 4. AOB/UPCOMING MODIFICATIONS

SEMO provided an update on an action item from Meeting 106 linked to outstanding long term item in relation to Mod\_27\_18. A background was given following e-mail circulated to the Committee on October 18<sup>th</sup> with the scenarios and dispatch instructions type involved. It was advised that these issues were discovered during Market Trial initially as defects but subsequently considered change requests bringing a higher level of cost associated with them. The high level impact provided from the vendor shows that each of these scenarios would need an individual Impact assessment, but at a high level they are already all considered high cost and high risk so much so they can only be implemented in different releases.

It was noted that among the cases associated with each of the 4 scenarios that were circulated, some don't have a known materiality due to the Instruction Profiling not being available for those cases. Scenario 1 and 4 calculation of materiality show large amounts where payments have been provided incorrectly and will need to be clawed back. It was also advised that these amounts cannot be manually amended as the QBOA amounts cannot be recalculated.

In summary SEMO advised that in relation to solutions it would be difficult to come up with an option to change the input for these scenarios in a meaningful way.\_A representative from the SEMO Settlement team advised that the any options considered resolving these issues would need more investigation. It was noted that the difficulties lay on what could be changed and what they were able to change. It was agreed with SEMO that the options available were very thin and some would need industry agreement or regulatory approval.

It was noted that the majority of these scenario were rare as the only examples found dated back to 2018 and that the mostly they have been addressed through raising awareness at dispatching stage so that the Control center would avowing issuing 'undo' instruction while units are still fulfilling their TODs obligations (such as reaching Minimum Stable Generation or Minimum Time Off etc). It was mentioned that a number of potential cases were still being investigated but the scenario (potentially with the exception of scenario 1) were all quite rare and was not detected in recent times.

A Supplier Member noted that any suggestions given would be both detailed and complex and requested that a document could be drafted to get a feel of what is being looked. At present it was felt that the proposals and workarounds were not clear.

Settlement advised that 2 out of 4 scenarios could have a path for a work around but not without potential knock on effects on other calculations.

DSU agreed that there is a lot of high level discussion and felt the Committee was not in a position to give views as there are limits around practicalities. It was understood there would be practicalities around workarounds but there was a concern about voicing opinion that any party should remain in non-compliance with the Code.

SEMO Member suggested that maybe there should be individual Modifications where SEMO would seek guidance. The RAs noted that this had been raised with them and 3 options were raised for progressing; however there has been no opportunity to discuss them. This would be on the agenda for a call with SEMO next week. SEMO advised that following this discussion, four Modifications would be raised and a change would be sought for those that have a more impact on the Market.

Secretariat thanked all for attending Meeting 107 and noted the Meeting 108 would take place on Thursday, 2<sup>nd</sup> December 2021.

	1 21 October 2021			
Status as a	at 21 October 2021			
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 26/03/21		
Modification Proposals 'Recomm	ended for Approval 'with Sy	stem impacts		
Mod_13_19 Payment for Energy Consumption in SEM for non-energy Services Dispatch	F	Sent for RA Decision 26/03/21		
Modification Proposal	s 'Recommended for Rejection	on'		
N/A	N/A	N/A		
RA Decision 'I	Further Work Required'			
N/A	N/A	N/A		
RA Decision Approved M	Iodifications with System Imp	pacts		
N/A	N/A	N/A		
RA Decision Approved Mo	difications with no System In	npacts		
Mod_16_21 Temporary use of the Market Backup Price where an Interconnector Trade Quantity and Price are submitted	E.3.6	29 September 2021		
Mod_13_21 Interest Modification	G.8.1.3 & Agreed Procedure 15	13 August 2021		
Mod_12_21 Clarification of text regarding the Effective Date of a Modification	T&SC B.17.20.4	13 August 2021		
Mod_11_21 Generator, Supplier and Renewable Seat	B.17.3 Glossary Part B Agreed Procedure 12	13 August 2021		
Mod_09_21 Housekeeping 2021	Part B Glossary; Part B Appendix C;	13 August 2021		
Mod_02_21 Setting a flag for Interconnector Actions above 500/Mwh	Appendix 2, F.2	Effective following deliver of required changes		
RA De	cision Rejected			
Mod_01_21 Removal of Difference Charges where operational constraints are binding	Appendices Part B	13 August 2021		
R	A Direction			
Mod_08_20 Imbalance prices to reflect the real-	D.4.4.12	Decision letter received -		

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time value of energy		29/10/20
AP	Notifications	
N/A	N/A	N/A
Withdray	wal Notifications	
Mod_08_21 Removing the 10MW limit for some Demand Sites to enable Demand Sites that include, or are, and individual battery storage unit > 10MW to participate as part of a Demand Side Unit (DSU)	В	7 <sup>th</sup> July 2021
Mod_04_21 Expansion of System Service Flag to include Cross-Zonal Actions for System Security reasons	N.2	8 <sup>th</sup> July 2021
Mod_06_21 Proposing Invoice Improvements to reduce burden on Market Participants	G.7.1	8 <sup>th</sup> July 2021
Modification	Proposal Extensions	
N/A	N/A	N/A

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