



Final draft for webinar

All-island Network Code Stakeholder Forum

29th April 2021

Webinar



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- Please note RAs and SOs are sharing content and presenting materials remotely - please be patient if technical glitches occur!
- Participants can interact by:
 - Choose ‘chat’ - if you have a question or comment you would like addressed (during webinar)
 - Providing feedback after the meeting
- The webinar will not be recorded.
- Participants are welcome to send comments directly to RAs and SOs following the webinar
- Slides may be circulated in advance of the webinar and will be made available on-line after the meeting, subject to any error corrections that may be noted during the webinar.

Agenda

13h00	Introduction	5'
13h05	1. Update on Loose Volume Coupling (LVC) arrangements	55'
14h00	2a. Update on EU legislation (Network Codes & Clean Energy Package) <ul style="list-style-type: none">– Implementation progress– Future NCs– Q&A	45'
14h45	Break	10'
14h55	2b. Emergency Restoration Consultation	30'
15h25	2c. EBGL update	30'
15h55	Q&A	5''
16h00	Close	



Multi-Region Loose Volume Coupling (MRLVC)



Agenda

- Background (10 min)
- TSOs' Views (10 min)
- Interconnector Owners' Views (10 min)
- RA Wrap up and Next Steps (10 min)
- Questions (15 min)

Background



EU-UK Trade and Cooperation Agreement - Energy

Trade and Cooperation Agreement (TCA)

Energy

Other Areas

Electricity Trading over Interconnectors

Regulation Fundamentals

- No Discrimination
- No Transmission Charges

New Trade Arrangements

- TSOs to develop
- Day Ahead to apply from Apr 2022

TSO and Regulatory Cooperation

TSOs

- Replace ENTSO's
- Security of Supply

Regulators

- Replace ACER
- Market Transparency (REMIT)

North Sea Grid Cooperation

- Restore North Sea Energy Cooperation Group
- Multipurpose projects
- Maritime planning
- Support framework and finance

- Tariff & Quota Free Trade in Goods
- Transport
- Fisheries
- Union Programmes
- Social Security
- Law enforcement & Judicial cooperation
- Movement of People

New EU-UK Governance

- Partnership Council (Ministerial Level)
- Specialised Committee for Energy
- Replacements for ACER and ENTSOe/g

Implications of the UK/EU Trade and Cooperation Agreement



- SEM Day-Ahead Market (DAM) still run by Single Day Ahead Coupling (SDAC) but SEM DAM is now isolated
- No interconnection to GB included in the SEM DAM.
- SEM Intraday Auctions are first opportunity to utilise the Interconnectors

New Day-Ahead Cross-Border Trading Arrangements

Electricity Trading over Interconnectors

New Trade Arrangements

- TSOs to develop
- Day Ahead to apply from Apr 2022

- **TCA Annex ENER-4** specifies the requirements of the new Day-Ahead cross-border trading arrangements between the EU and UK.
- The requirements look to find a landing zone between the current arrangements (left) and the previous arrangements (right).



SEM - Intraday Trading (SEM)
Channel - Explicit Trading
Norway – Price Coupling

“Landing Zone” for new arrangements

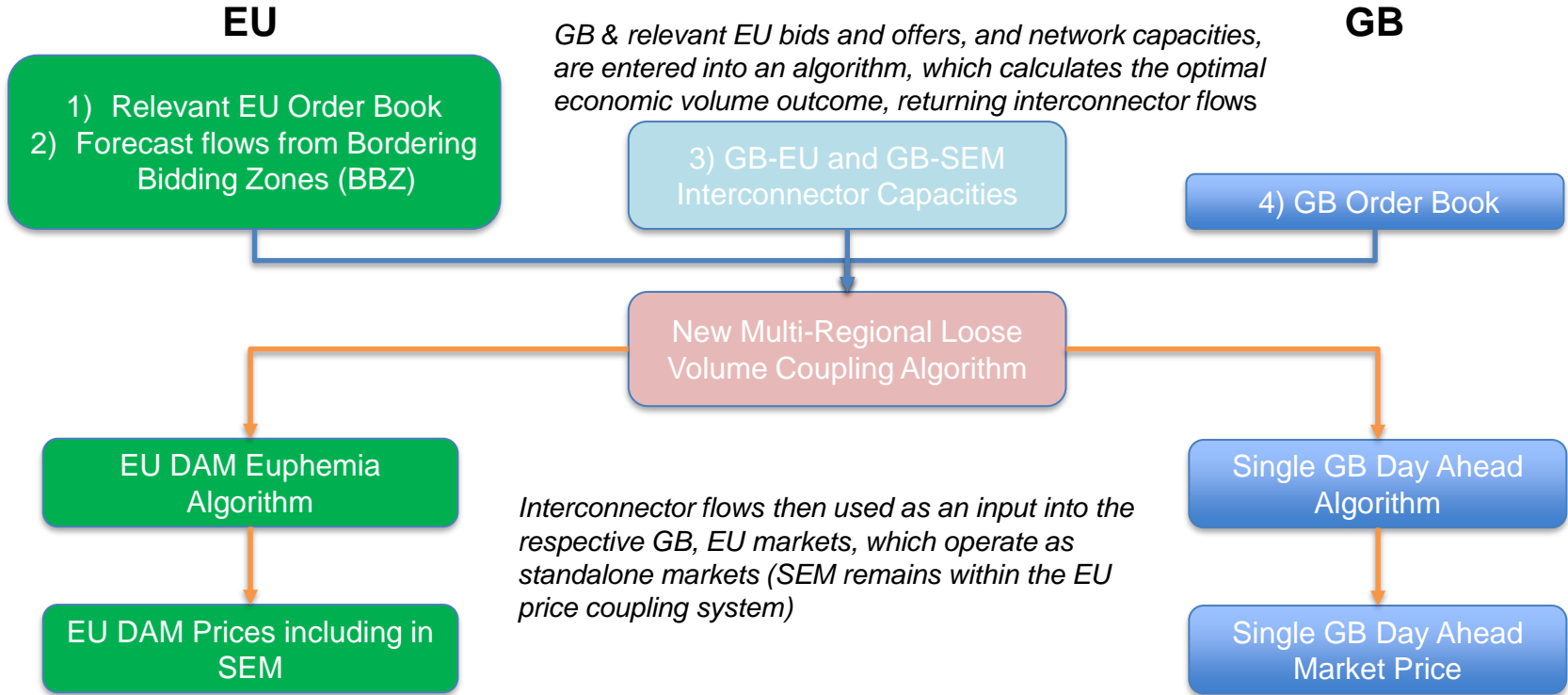


SDAC Price Coupling



Relative Efficiency

MRLVC General Concept



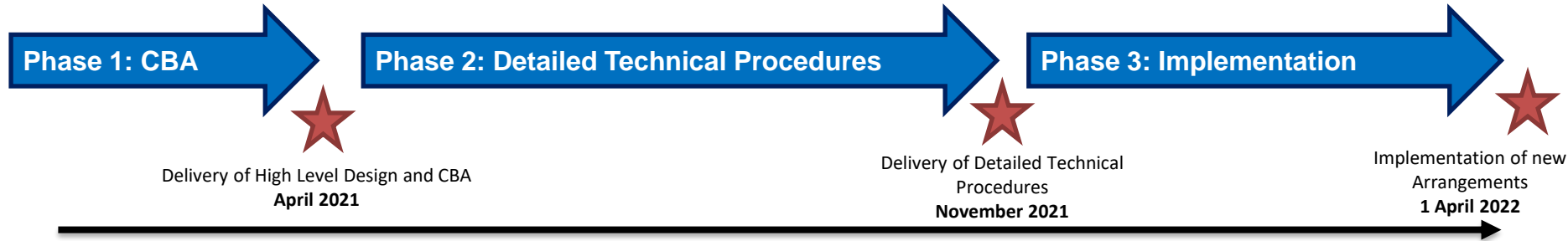
Timeline

Electricity Trading over Interconnectors

New Trade Arrangements

- TSOs to develop
- Day Ahead to apply from Apr 2022

- UK and EU TSOs have been given the responsibility to develop these arrangements
- Timelines have been defined (Annex ENER-4 Part2).
- Three parts to the work:
 1. Develop a **High Level Design (HLD)** and **Cost Benefit Analysis (CBA)** of the High Level Design
 2. Develop **Detailed Technical Procedures** to implement the High Level Design and seek regulatory opinions
 3. Following approval from the Specialised Technical Committee for Energy, to **implement** the approved mechanism



Current Status

Completed:

- Cost Benefit Analysis and High Level Design Options

In Progress:

- CBA published by UK and EU TSOs for industry feedback (26th April to the 16th May)
- UK TSOs and EU TSOs will provide recommendations to BEIS/EC respectively
- ACER(EU NRAs) and UK RAs feedback to EC/BEIS(DfE) respectively.
- Consideration then of next steps by BEIS/EC and Special Committee for Energy

Structure of CBA and HLD

- **Review of Historical Implementations**
- **Comparing “As-Is” against two MRLVC designs**
 - Qualitative and Quantitative Analysis
- **Assessment against a range of criteria**
 - e.g. Welfare, Revenues, Environmental Benefits, Ease and Cost of implementation/Operation, Complexity, Impact on existing processes, etc..
- **CBA identified a number of aspects for consideration, that are critical to a “good” MRLVC solution**
 - e.g. Bordering Bidding zone estimation accuracy, impacts on SDAC, necessity for common order books for MRLVC and SDAC, critical impacts on implementation timelines
- **Additional design variations also included for consideration to mitigate challenges identified in CBA**
- **CBA should be considered an aid for parties to drawing conclusions, not a definitive answer**
 - This was by design, due to: limited time available to perform the CBA analysis, necessity for both qualitative and quantitative considerations, and the range of design options being dependent on the willingness to adapt existing processes

TSOs' Views

Options for Implementation

- Options Assessed in the CBA
 - Preliminary Order Books
 - Common Order Book (with SDAC process impacts)
 - No Change: Retain existing arrangements
- Variations identified in the CBA
 - Common Order Book (with SDAC gate window closure earlier)
 - Common Order Book (with SDAC results later)

EirGrid/SONI TSOs' View on MRLVC

- A good MRLVC would be the best available solution for the SEM.
 - Can't go back to price coupling based on TCA
 - Better solution for a coupled market with lower price spreads and more volatility in prices
 - Easier accessibility for market participants to GB bids/offers
 - Other explicit options appear less efficient e.g. PTRs
- “Good” MRLVC requires the following:
 - Using common order books for MRLVC and SDAC
 - In order to minimise flows against price difference
 - Accuracy in the estimation of flows from non-adjacent bidding zones i.e. BBZ
 - Limiting impacts on SDAC in order to maintain its stability
 - Requiring either an earlier gate closure time for SDAC, or later publication time for SDAC results
 - Single GB price and full GB DAM volumes available to MRLVC
 - Same product set in SDAC and MRLVC
 - Includes complex orders and ideally re-uses EUPHEMIA
- Maintaining this as a full UK/EU project is beneficial for the SEM as identified challenges will still exist even if a SEM specific implementation is pursued.
- Existing 15 month implementation timelines may be challenging, but once further details on the design are known this can be further evaluated.

EU TSO Recommendation to European Commission

Interconnector Owners' Views

EIDAC / Moyle views on the MRLVC

- Cross border Implicit allocation mechanisms would be the best available solution for the SEM.
- MRLVC satisfies this requirement; no adjacent BBZ flow determination in SEM until Celtic will promote good forecasting
- Complex Governance between MRLVC, BBZ and GB Price workstreams
- FTR Products can be re-introduced against a good MRLVC with limited impact (local access rules etc)
- CBA report highlights the risks of using PTR's with multiple interconnectors and more complex nodes (e.g. Offshore). Only considered in the CBA as an alternative to MRLVC at day ahead.
- Sequence of detailed workshops required to finalised implementation timeframe

UK TSOs Recommendation to BEIS

RA Wrap Up and Next Steps



Stakeholder Engagement

EU Channel

- Industry feedback on CBA, which is published at [ENTSOE hub](#)
 - Consultation open 26th Apr to 16th May
- All Island Industry Forum
 - 29th April
- EU Forum on MRLVC (presentation by EU TSO)
 - 4th May at 1-3:30 PM GMT

UK Channel

- CBA has been published on the National Grid website, and individual UK TSO websites ([Moyle/EWIC](#)) to allow industry and market actors to analyse the cost benefit analysis and high-level design and provide feedback.
- Stakeholder engagement in the following forums
 - SEM – All Island Industry Forum (29th April)
 - UK – EFET-Energy UK TCA Forum (11th May)
 - UK – Joint European Stakeholder Group (11th May)

- We would urge you to provide **feedback through both UK and EU channels**



Regulatory update on EU Network Codes and Clean Energy Package

Adam Fitzpatrick (CRU)

Heather Pandich (CRU)

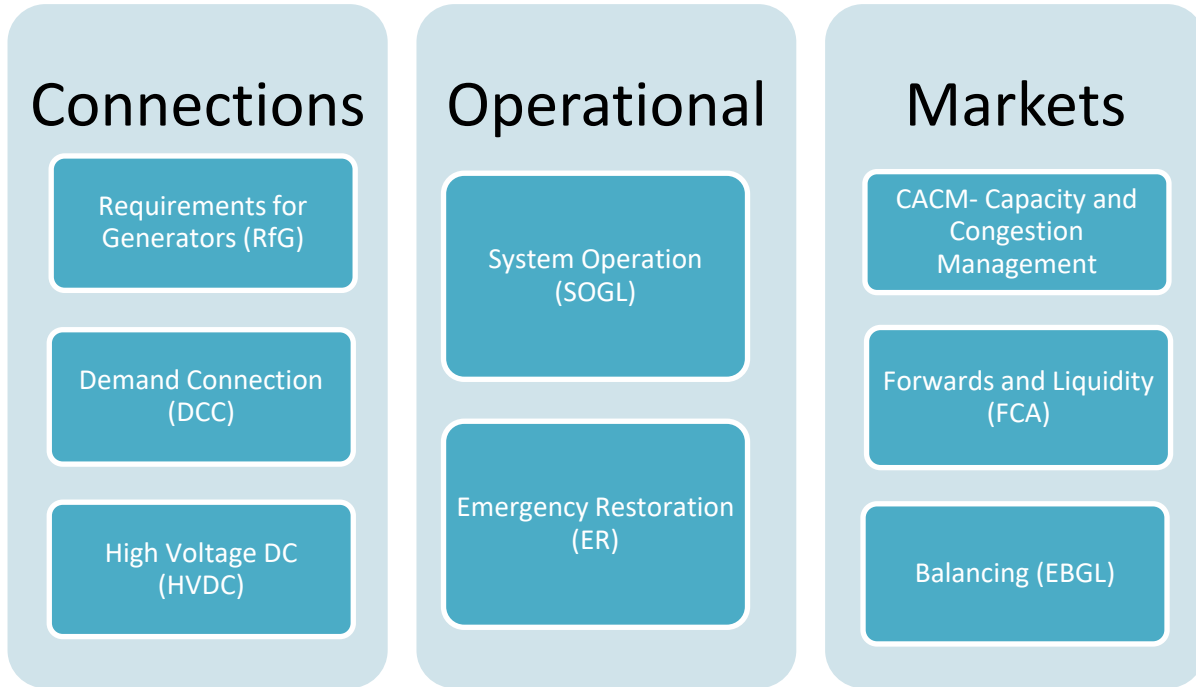
Ian McClelland (UR)

Kenny McPartland (UR)

Why should you be interested?

- **Changes to connection standards** – Generator Connections, Demand connections, HVDC connections (Interconnectors/Offshore etc)
- **Changes to System Operations, Data Exchange requirements, Grid codes, Black start services, Emergency procedures** - System Operation, Emergency Restoration
- **Changes to Market Operations, Harmonised EU Platforms, Interconnector Flows** - Electricity Balancing, CACM, FCA

EU Network Codes and Guidelines



Visibility of work underway

TSOs

SONI [website](#)

EirGrid [website](#)

DSOs

ESBN [website](#)

NIE
[website](#)

Regulatory Authorities

CRU
[website](#)

UR
[website](#)

All-EU Bodies

ENTSO-E [website](#)

CEER [website](#)

ACER [website](#)

Requirements for Generators (RfG)

- **UR/CRU Update** – Derogation requests received from TSOs on Articles 15.2.d (i), (ii) & (iii), 16.2, 18.2.b (i), 21.3.b (i) & (ii) and 25.5 of the RFG. Approval expected around the end of August from CRU. UR legal team are reviewing the derogations with a decision expected in the coming weeks.
- **CRU Update** - Approved derogation requests from EirGrid on Articles 15.2.d (i), (ii) & (iii), 16.2, 18.2.b (i), 21.3.b (i) & (ii) and 25.5 in October 2020.

Demand Connection Code (DCC)

- **UR** – SONI are proceeding to incorporate all UR approved DCC parameters in to SONI Grid code along with the clauses that have outstanding RfAs.
- It has been agreed with SONI that they will issue a holding response, in the form of a progress status, ensuring that the consultation explicitly states what parameters are being consulted upon, i.e. the approved parameters and the RfA.
- **CRU** - Approved derogation requests from EirGrid on Articles 13.1 and 53.1 in October 2020. In the same decision, EirGrid's proposals on Articles 18.3, 19.1, 19.4 (a) & (c), 28.2 (e) & (l) and 29.2 (d) & (e) were approved, which were amended following request from the CRU.

HVDC

- **UR** - SONI have responded to a RFA for their HVDC submission, this was received by UR in May 2020. After further discussions with SONI, the UR are currently reviewing the amendments and will be responding with our decision in the near future.
- **CRU** - Decision paper on HVDC parameters published in October 2020, approval of derogation requests under Articles 18.1, 39.8 and 40.1 published separately in the same month.
- CRU is expecting submission of Grid Code modifications for HVDC for approval shortly.

Emergency & Restoration Code

- **Recent approval** – In February 2021, UR and CRU approved SONI and EirGrid’s Emergency Restoration proposals which meet the requirements of Article 4.2 (a-f) of NCER. The TSO’s went out for consultation on the Test Plans for the NCER in April 2021.

System Operation (SOGL)

- **UR/CRU recent approvals** – UR and CRU have approved the TSO’s proposal under Article 145.2 (Cost benefit analysis of not implementing an automatic Frequency Restoration Process (aFRP)). The RAs and TSOs will re-evaluate the implementation of an aFRP in April 2023.
- The UR have approved SONI’s submission of Article 6.4(b) Scope of Data exchange with the DSOs and significant grid users in March 2020. The CRU approved EirGrid’s submission under the same requirement in September 2020.
- **UR/CRU ongoing work** – UR and CRU have reviewed the TSO’s submission of Article 6.3(a) Each synchronous area for the definition of minimum inertia. The RA’s are working closely with the TSOs in order to address some additional information requested by the RAs.

Northern Ireland TSO Obligations

- **Ongoing work** – In October 2020, UR consulted on the TSO obligations which identify the obligations placed on the Transmission System Operators (TSO's) of Northern Ireland in the RfG, DC, HVDC and SOGL Network Codes.
- After seeking legal advice in relation to the obligations, UR will be continuing further discussions with the relevant TSO's of NI and working through to publishing these obligations in the coming months.

MARKET CODES: FCA & CACM

- **FCA:**
 - No recent approvals.
- **CACM:**
 - CACM is in the process of being amended following a recommendation from the European Commission in accordance with the Electricity Regulation (EU) 2019/943 of the Clean Energy Package.
 - The topics being reviewed for amendments include;
 - General improvements,
 - MCO Governance,
 - Single day-ahead and intraday coupling,
 - Costs & Congestion Income Distribution,
 - Capacity Calculation,
 - Remedial Actions, and
 - Bidding Zone Review
 - ACER currently has a [public consultation](#) open to receive feedback on their draft proposals. This Consultation will close on 10 June 2021.

MARKET CODES: EBGL

15 Minute ISP Exemption (Article 53) SEM-21-015

- Requirement to implement 15 minute ISP unless derogation or exemption provided.
- SEM RAs undertook CBA (in cooperation with ACER) to assess costs and benefits of a change to a 15 minute ISP.
- Net welfare results showed a cost to all-island consumers of between €61-€105 million.
- SEM RAs have granted an exemption to this requirement (SEM-21-015)
- Exemption lasts for a period of 3 years.

MARKET CODES: EBGL

Consultation on Compliance with the EBGL

- RAs and TSOs are currently consulting on the compliance of the current SEM arrangements with the requirements of the EBGL.
- Closes Fri 18th June 2021.
- This is a separate agenda item today.

Future Network Codes

- **Demand Side Flexibility:**

- As part of wider review of Distribution Systems, European Commission is exploring the potential for a new network code on Demand Side Flexibility (DSF)
- It is currently unclear what the outcome of the review will be, but it could take the following forms:
 - A new network code dedicated to DSF, although the scope of this is yet undefined
 - Amendments to existing network codes
 - A combination of both of the above points

- **Cyber security**

- Framework guideline drafted for consultation
- Established baseline security standards for most undertakings
- Advanced cyber security standards for ‘Essential’ Undertakings
- RAs are still reviewing the contents; which are quite complex

Clean Energy Package Update

Clean Energy Package Update

- **Aggregation under Articles 6 & 7:** Decision Paper (SEM-20-088) published December 2020.
- **ISP under Article 8:** Information Paper on ISP Exemption (SEM-21-015) published March 2021.
- **VoLL, CoNE & Reliability Standard under Articles 11 & 25:** The RAs are currently in the process of calculating the new market parameters for the SEM in line with the recently approved ACER Methodologies.
- **Balancing Capacity Procurement under Article 6:** Scoping Paper on System Services Future Arrangements (SEM-20-044) published in November 2020.

Clean Energy Package Update

- **Dispatch and Redispatch under Articles 12 & 13:**
 - Decision Paper on Eligibility for Priority Dispatch pursuant to Regulation (EU) 2019/943 (SEM-20-072) published in November 2020.
 - Consultation on Dispatch, Redispatch and Compensation pursuant to Regulation (EU) 2019/943 (SEM-21-026) published April 2021.
 - Proposed Decision on Treatment of New Renewable Units in the SEM (SEM-21-027) published April 2021.
 - SEM-21-026 and SEM-21-027 are open for response until 2 July 2021.
- **RCC Establishment under Article 35:**
 - Proposal for RCC establishment received by RAs from TSOs in July 2020.
 - ACER published a Consultation in January 2021 setting out amendments to CCRs which impacted and delayed the Decision on the TSOs' RCC establishment proposal.
 - Decision on CCRs additional Decision on SORs will enable the RAs to approve an updated RCC establishment proposal.



DSO update



ESBN updates

RfG update

- All Operational Notification Process content now adopted through Mods at Distribution Code review Panel [DCRP].
- Previous related mods with CRU for approval.
- Others from March DCRP meeting to be sent to CRU shortly.
- Power Generation Module Documents [PGMD] to be socialized to industry shortly.

DCC update

- All Operational Notification Process content now adopted through Mods at Distribution Code review Panel [DCRP].
- Mods from March DCRP meeting to be sent to CRU shortly.

Subject to CRU approval, all Connection Code Mods now complete



Update conclusion

- Questions?
- Please request workshops
- Watch out for consultations
- Engage at Grid Code/Distribution Code
- Please ensure your businesses are informed

Thank you



Break





Emergency Restoration Test Plan Consultation

Niamh Daly

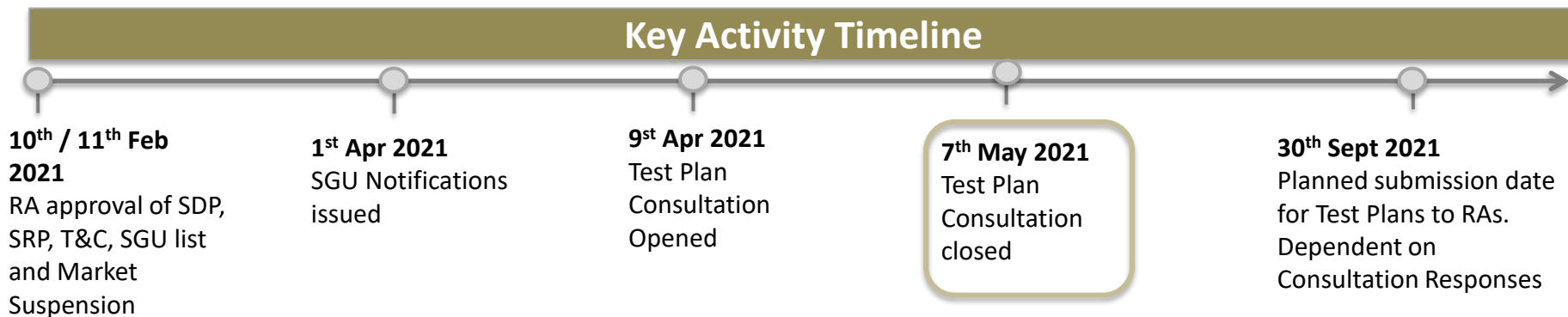


Emergency & Restoration Code - overview

- The Network code for ER came into effect on 18/12/2017.
 - Objective being the establishment of rules relating to the management of the transmission system, in the event of :
 - Emergency
 - Blackout
 - Restoration
 - So that the transmission system can be brought back to the normal, stable state.

EirGrid and SONI Emergency & Restoration Code (ER)

Working towards submission outstanding ER documents to RAs and confirmation of compliance.



Please review and response to the Consultation at the below links:

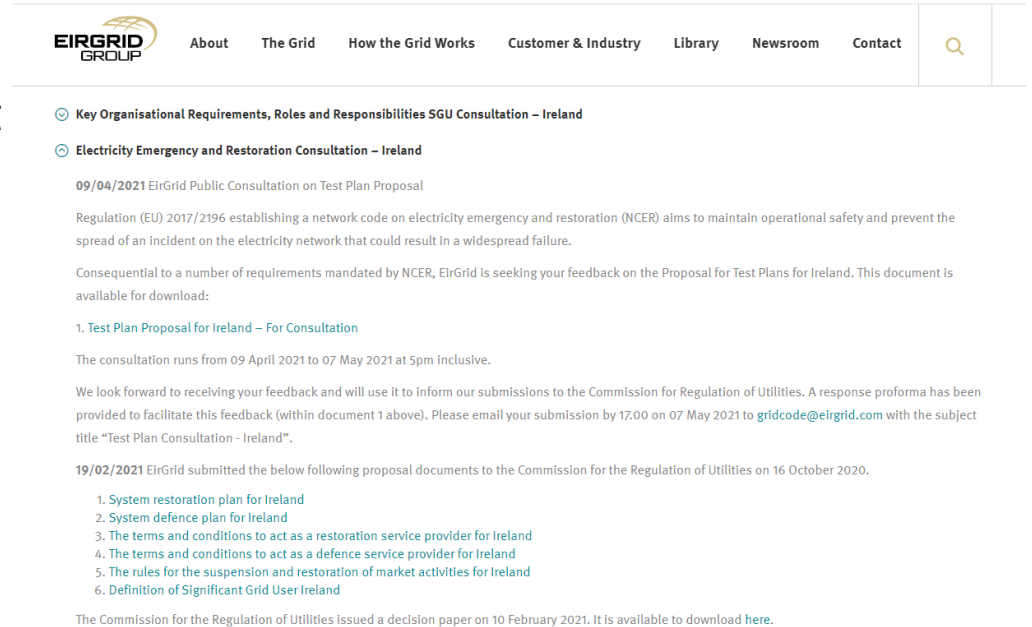
SONI: <http://www.soni.ltd.uk/customer-and-industry/european-integration/integration/>

EirGrid: <http://www.eirgridgroup.com/customer-and-industry/european-integration/integration/information>

Test Plan Consultation – EirGrid

- The Test Plan consultation shows how the TSO and DSO plan to test the measures previously agreed within the System Restoration Plan(SRP) and System Defence Plan(SDP).
- These documents along with the consultation can be found at the below link

[EirGrid Group Website](#)



The screenshot shows the EirGrid Group website navigation menu with links for About, The Grid, How the Grid Works, Customer & Industry, Library, Newsroom, and Contact. Below the menu, there are two main consultation sections:

- Key Organisational Requirements, Roles and Responsibilities SGU Consultation – Ireland**
- Electricity Emergency and Restoration Consultation – Ireland**

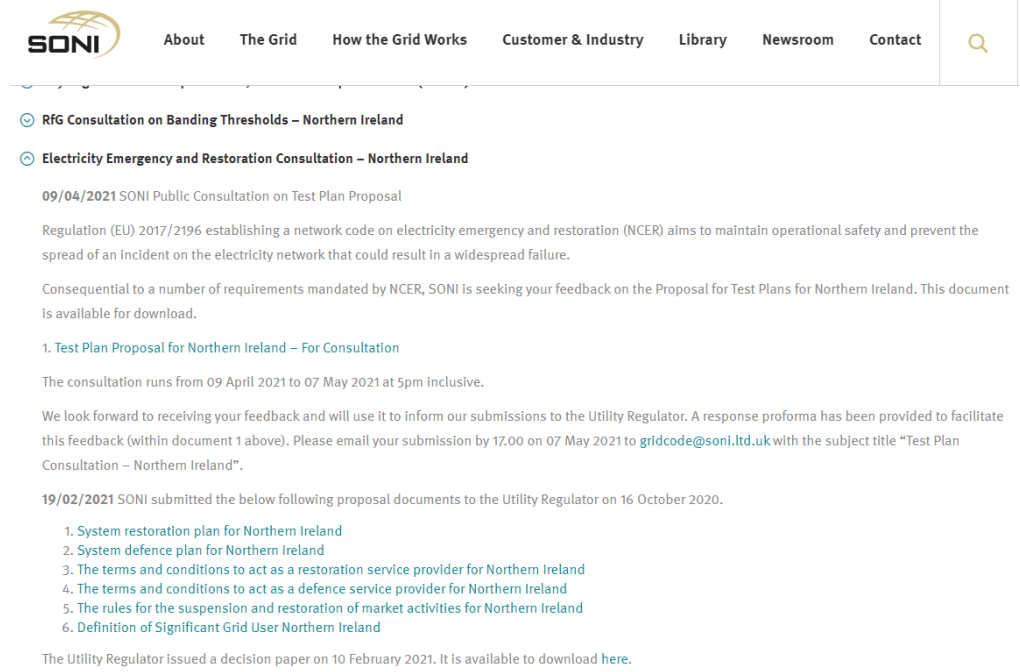
The Electricity Emergency and Restoration Consultation section includes the following details:

- 09/04/2021** EirGrid Public Consultation on Test Plan Proposal
- Regulation (EU) 2017/2196 establishing a network code on electricity emergency and restoration (NCER) aims to maintain operational safety and prevent the spread of an incident on the electricity network that could result in a widespread failure.
- Consequential to a number of requirements mandated by NCER, EirGrid is seeking your feedback on the Proposal for Test Plans for Ireland. This document is available for download:
- [1. Test Plan Proposal for Ireland – For Consultation](#)
- The consultation runs from 09 April 2021 to 07 May 2021 at 5pm inclusive.
- We look forward to receiving your feedback and will use it to inform our submissions to the Commission for Regulation of Utilities. A response proforma has been provided to facilitate this feedback (within document 1 above). Please email your submission by 17:00 on 07 May 2021 to gridcode@eirgrid.com with the subject title "Test Plan Consultation - Ireland".
- 19/02/2021** EirGrid submitted the below following proposal documents to the Commission for the Regulation of Utilities on 16 October 2020:
 - [1. System restoration plan for Ireland](#)
 - [2. System defence plan for Ireland](#)
 - [3. The terms and conditions to act as a restoration service provider for Ireland](#)
 - [4. The terms and conditions to act as a defence service provider for Ireland](#)
 - [5. The rules for the suspension and restoration of market activities for Ireland](#)
 - [6. Definition of Significant Grid User Ireland](#)
- The Commission for the Regulation of Utilities issued a decision paper on 10 February 2021. It is available to download [here](#).

ER Consultation - SONI

- The Test Plan consultation shows how the TSO and DNO plan to test the measures previously agreed within the System Restoration Plan(SRP) and System Defence Plan(SDP).
- These documents along with the consultation can be found at the below links

[SONI Website](#)
[EirGrid Group Website](#)



The screenshot shows the SONI website navigation menu with links for About, The Grid, How the Grid Works, Customer & Industry, Library, Newsroom, and Contact. Below the menu, there are two consultation documents listed:

- ☑ RFG Consultation on Banding Thresholds – Northern Ireland
- ☑ Electricity Emergency and Restoration Consultation – Northern Ireland

The second document, "Electricity Emergency and Restoration Consultation – Northern Ireland", is expanded to show the following text:

09/04/2021 SONI Public Consultation on Test Plan Proposal

Regulation (EU) 2017/2196 establishing a network code on electricity emergency and restoration (NCER) aims to maintain operational safety and prevent the spread of an incident on the electricity network that could result in a widespread failure.

Consequential to a number of requirements mandated by NCER, SONI is seeking your feedback on the Proposal for Test Plans for Northern Ireland. This document is available for download.

1. [Test Plan Proposal for Northern Ireland – For Consultation](#)

The consultation runs from 09 April 2021 to 07 May 2021 at 5pm inclusive.

We look forward to receiving your feedback and will use it to inform our submissions to the Utility Regulator. A response proforma has been provided to facilitate this feedback (within document 1 above). Please email your submission by 17.00 on 07 May 2021 to gridcode@soni.ltd.uk with the subject title "Test Plan Consultation – Northern Ireland".

19/02/2021 SONI submitted the below following proposal documents to the Utility Regulator on 16 October 2020.

1. System restoration plan for Northern Ireland
2. System defence plan for Northern Ireland
3. The terms and conditions to act as a restoration service provider for Northern Ireland
4. The terms and conditions to act as a defence service provider for Northern Ireland
5. The rules for the suspension and restoration of market activities for Northern Ireland
6. Definition of Significant Grid User Northern Ireland

The Utility Regulator issued a decision paper on 10 February 2021. It is available to download [here](#).

ER Test Plan - EirGrid and SONI

Key Aspects:

- Design of Test Plans
- Application of the Test Plan to System Restoration Plan measures
 - Black Start
 - Quick Resynchronisation
- Application of the Test Plan to System Defence Plan measures
 - Automatic Tripping Schemes
 - Operating Reserve
 - Central Dispatch Instructions
 - Manual Tripping Schemes
 - Interconnectors
 - Compliance with NCER Articles 44 to 46

Response Proforma Included EirGrid and SONI

Response proforma Ireland re-submission

Emergency and Restoration – Response Proforma

EirGrid invites responses to this consultation by 7th May 2021. The responses to the specific consultation questions (below) or any other aspect of this consultation can be provided by completing the following form. The form is also available in .doc format at the Electricity Emergency and Restoration consultation section of our website.

Please return the completed form to gridcode@eirgrid.com with "NCR: Test Plans" in the subject field in the response email.

Respondent:	
Company Name:	
Does this response contain confidential information? If yes, please specify.	
Name of Consultation this response is in relation to:	

No	Question	Response (Y/N)	Rationale
1	Do you agree with the approach taken in the proposal? please provide rationale		
2	Do you agree that the proposal is consistent with the principle of minimum necessary change? please provide rationale		
3	Do you have any other comments in relation to the proposal?		

Emergency and Restoration – Test Plan for Ireland

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Response proforma Northern Ireland re-submission

Emergency and Restoration – Response Proforma

SONI Ltd invites responses to this consultation by 7th May 2021. The responses to the specific consultation questions (below) or any other aspect of this consultation can be provided by completing the following form. The form is also available in .doc format at the Electricity Emergency and Restoration consultation section of our website.

Please return the completed form to gridcode@soni.ltd.uk with "NCR: Test Plans" in the subject field in the response email.

Respondent:	
Company Name:	
Does this response contain confidential information? If yes, please specify.	
Name of Consultation this response is in relation to:	

No	Question	Response (Y/N)	Rationale
1	Do you agree with the approach taken in the proposal? please provide rationale		
2	Do you agree that the proposal is consistent with the principle of minimum necessary change? please provide rationale		
3	Do you have any other comments in relation to the proposal?		

Emergency and Restoration – Test Plan for Northern Ireland

Page 4

ER Consultation - EirGrid and SONI

- Any questions? (time dependent). Follow up questions can be sent to gridcode@eirgrid.com or gridcode@soni.ltd.uk
- Please respond formally through the Consultation process if you have any concerns with the content of the Consultation documents



EBGL update

Ian McClelland

Martin Kerin



Background

- Since December 2019 the Regulatory Authorities (RAs) and SEMO have been carrying out an analysis of the compliance of the local SEM market arrangements with the Guideline on Electricity Balancing (2017/2195);
- On 9th April 2021 the Regulatory Authorities published a consultation on the SEM Committee website assessing this compliance;
- This consultation comprises of a Regulatory Authorities cover paper and a paper with a summary of analysis from Eirgrid and SONI;

Next steps

- The Regulatory Authorities are seeking views on this compliance assessment, including:
 - Scope covered in topics in both papers;
 - Possible changes highlighted in different areas;
 - Assumptions/interpretations made as part of assessment; and
 - Other areas respondents feel not captured.
- This consultation closes on Friday 18 June 2021.

Summary of analysis work

- TSOs completed analysis of each individual paragraph in the EBGL for submission to the RAs;
- Included references to the EBGL related methodologies, primarily Imbalance Settlement Harmonisation Proposal (ISHP) and Pricing Proposal (PP);
- High level conclusion: The SEM is currently compliant in material respects with the EBGL requirements;
- 271 paragraphs found to be N/A to local compliance at this time (e.g. applies at all-TSO level through ENTSO-E, or related to processes not active in the SEM, either not expected to ever be relevant, or may become relevant in the future but does not impact compliance now);
- 96 paragraphs considered compliant from initial analysis;
- 46 paragraphs considered requiring additional analysis to determine compliance, combined and outlined into 23 potential issues – focus of consultation.

Summary of analysis work

- Following further analysis of the potential issues:
 - 10/23 considered compliant (typo in published document saying 9/23);
 - 5/23 considered compliant but small changes still suggested as useful (typo in published document saying 6/23);
 - 4/23 considered inconclusive;
 - 4/23 considered requiring changes to meet EBGL requirements.
- Analysis paper accompanying consultation SEM-21-017 outlines the TSO positions on each of these issues, with background information and rationale to assist participants in understanding these positions;
- Overall conclusion is that the SEM is considered substantially compliant with the EBGL in material respects, with a small number of less material areas where changes may be required to meet the EBGL requirement;
- Seeking participant feedback on whether they agree with the overall conclusion of the analysis work, and with the position in each of the more detailed potential issue areas – if not, or if issue is considered non-conclusive, seeking suggestions for different views or approaches with justification.

Summary of analysis work

Title in Report	High Level Position	Potential Impact of Change if Required
2.1.1 Core Pricing Issues: Non Marginal Flagging Functionality	Inconclusive	TSC change and parameter
2.1.2 Less Core Pricing and Settlement Issues: Market Backup Price	Changes required	TSC change and price system
2.1.3 Less Core Pricing and Settlement Issues: Administered Scarcity Price	Inconclusive	TSC change and rarely used price system
2.2.1 Core Pricing Issues: PMEA and PRBO Functionality	Compliant	N/A
2.2.2 Core Pricing Issues: 5 Minute versus 30 Minute Periods	Compliant	N/A
2.2.3 Less Core Pricing Issues: Congestion and Price Setting	Compliant	N/A
2.2.4 Less Core Pricing Issues: Pricing Parameters	Compliant	N/A
2.2.5 Less Core Pricing Issues: Imbalance Positive and Negative Sign Convention	Compliant with potential useful change	TSC change only
2.3.1 Governance and Changes: Modifications Processes	Inconclusive	TSC change and new processes
2.3.2 Governance and Changes: General Governance of Terms and Conditions Proposal	Inconclusive	Either TSC change or new document, and new processes
2.3.3 Gate Closure Time: Integrated Scheduling Process Gate Closure Time	Changes required	TSC change and bidding, scheduling, and profiling systems
2.4.1 Governance and Changes: Formal Complaints Channel	Compliant	N/A
2.4.2 Data Requirements: Publishing Offer Prices and Quantities	Compliant	N/A
2.4.3 Data Requirements: Anonymised Incremental / Decremental Prices	Compliant	N/A
2.4.4 Definitions: Calculations of Imbalance and Imbalance Adjustment	Compliant with potential useful change	Either TSC change or new document
2.4.5 Definitions: EBGL Objectives	Compliant with potential useful change	TSC change only
2.4.6 Definitions: Balance Responsibility	Compliant with potential useful change	TSC change only
2.4.7 Specific Products: Integrated Scheduling Process Bids	Compliant	N/A
2.5.1 Core Settlement Issues: Pumped Storage Units	Changes required	TSC change and settlement system
2.5.2 Core Settlement Issues: Demand Side Units	Changes required	TSC change and settlement and meter systems
2.6.1 Core Settlement Issues: Settling Units at "Better" of Imbalance Settlement Price and Bid Offer Price	Compliant	N/A
2.6.2 Less Core Settlement Issues: Additional Settlement Items	Compliant	N/A
2.6.3 Less Core Settlement Issues: Clarifying the Default Values for Variables When No Data Available	Compliant with potential useful change	TSC change only

Summary of analysis work

- Consultation period ends 18/06/2021;
- Following SEMC decision, if any areas are found to need changes, these will enter the normal process for market changes:
 - Modifications to the TSC to be raised by SEMO (earliest by August meeting, expect some to be later);
 - If the modification is approved and requires system changes to enact it, the change requests are drafted and entered into the normal prioritisation process for system changes, assessed against other required changes;
 - Expected to be delivered as part of a normal system update, timing dependent on the size and priority of the work for each individual change.
- Some areas expected to be a large amount of work which may require long delivery times (e.g. changes in TOD gate closure times), or may already be considered under a different parallel piece of work the completion of which would implicitly deliver the changes needed for the EBGL (e.g. energy settlement of DSUs).

Summary of analysis work

- Link to consultation documents:
- RA Consultation Cover Note:

<https://www.semcommittee.com/sites/semc/files/media-files/SEM-21-016%20Regulatory%20Authorities%20consultation%20on%20compliance%20of%20the%20SEM%20with%20EU%20Electricity%20Balancing%20Guideline.pdf>

- TSO Analysis:

<https://www.semcommittee.com/sites/semc/files/media-files/SEM-21-017%20EirGrid%20and%20SONI%20Analysis%20of%20SEM%20Compliance%20with%20Guideline%20on%20Electricity%20Balancing.pdf>

- Questions?



Final Q&A, closing remarks and wrap up

- Meeting material publication
- Comments and queries on the session
- Feedback and planning for future sessions
- Thanks for your time & participation!

Abbreviations

- CSAm – Coordinated Security Analysis Methodology
- ENTSOE – European Network of Transmission System Operators for Electricity
- ER – Emergency and Restoration
- IU CCR – Ireland United Kingdom Capacity Calculation Region
- LFCBOA – Load Frequency Block Operational Agreement
- NCER – Network Code for Emergency and Restoration
- RA – Regulatory Authorities
- RAOAm – Relevant Assets Outage Coordination
- RCC – Regional Control Centre
- RSC – Regional Security Coordinator
- S&ROMA – Suspension and Restoration Of Market Activities
- SAOA – Synchronous Area Operational Agreement
- SDP – System Defence Plan
- SGU – Significant Grid User
- SOR – System Operation Region
- SRP – System Restoration Plan