# Review of Recommended Values for Scheduling and Dispatch Policy Parameters 2026

Long Notice Adjustment Factor & System Imbalance Flattening Factor (LNAF and SIFF)





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# 1. Licence Obligation

EirGrid and SONI, as the Transmission System Operators (TSOs) for Ireland and Northern Ireland, are submitting the Long Notice Adjustment Factor (LNAF) and System Imbalance Flattening Factor (SIFF) for the 2026 calendar year to the Commission for Regulation of Utilities (CRU) & the Utility Regulator for Northern Ireland (UR). In accordance with SONI TSO licence condition 22A part 7 and EirGrid TSO licence condition 10A part 7, TSOs are obliged to provide a report annually or as requested by the Authority/Commission as detailed in the condition below:

'The Licensee shall provide a report to the Authority/Commission on an annual basis, or whenever so required by the Authority/Commission, on the performance of its scheduling and dispatch process, resulting from the current values of the scheduling and dispatch policy parameters. The Licensee may propose changes to the values of those parameters, or their replacement with different parameters. After publication of the Licensee's report and following consultation with such persons as the Authority/Commission believes appropriate, the Authority/Commission may determine that the values of the policy parameters shall change, or that different policy parameters shall be used. Such a determination shall specify the date from which any such changes shall take effect and may specify transitional arrangements to be applied by the Licensee.'

To meet the obligations of the licence conditions, TSOs are providing this report on the performance of the current scheduling and dispatch parameters known as the LNAF and the SIFF. In this report the TSOs also recommend the LNAF and SIFF values for the calendar year 2026.

# 2. Terms and Definitions

The LNAF, SSII and SIFF terms are defined in *Table 1* below. The LNAF and SIFF definitions are as outlined in the SONI and EirGrid Transmission Licences.

Term	Definition		
LNAF	Long Notice Adjustment Factor - A multiplier applied to the start-up costs of generation sets which varies depending on the length of notice provided in any instruction from the Licensee to synchronize such generation set, and which has greater values for greater lengths of notice.		
SSII	System Shortfall Imbalance Index - Is the ratio of the total of any energy shortfall over a Trading Day (the sum of energy shortfalls in each Imbalance Settlement Period) divided by the total energy demand forecast for the Trading Day. SSII takes the form of a real number between 0 and 1. Zero indicates no shortfall. A value of 0.01 indicates a 1% energy shortfall for the Trading Day.		
SIFF	System Imbalance Flattening Factor - A multiplier applied to the start-up costs of generation sets which varies depending on the degree to which forecast generation including forecast imports and forecast exports on Interconnectors is short of forecast demand and which has greater values for greater shortages.		

Table 1: Terms and definitions

# 3. Background of LNAF and SIFF Parameters

#### 3.1. Intent of LNAF and SIFF Parameters

One of the Single Electricity Market (SEM) objectives is that the day-ahead and intraday markets should be the primary mechanisms by which the energy supply/demand balance is resolved. If the market finds a balanced energy position through the ex-ante markets, the need for TSO energy actions will be minimised.

In the SEM arrangement, the balancing market opens after the completion of the day-ahead market. This is to allow the TSOs to begin to schedule units to maintain a secure system based on the day-ahead market results. Consequently, the balancing market and intraday market are open at the same time. Subsequently, this requires the establishment of the following objectives:

- Insofar as it is possible, energy balancing actions should be deferred as much as possible until after
  the Balancing Market Gate Closure, and the ex-ante markets should be left to resolve the energy
  supply/demand balance.
- The TSOs should not take any action prior to the balancing market gate closure unless it is for reasons of system security, e.g. for reserves, for priority dispatch, or for other statutory requirements.
- Costs for both constraint (non-energy) actions and energy actions should be minimised.

If the market finds a balanced energy position through the ex-ante markets, the need for TSO energy actions will be minimised. However, if the market is not balanced, there is a risk that the proposed approach could result in "early" actions (i.e. TSOs, based on Commercial Offer Data <sup>1</sup>, may have to call the long notice units and will need to do this before the gate closure) that could dilute the signals to market participants to be balanced or could appear to impact the intraday market. Therefore, it is necessary to meet the objectives outlined above while minimising costs and deferring energy balancing actions as late as possible before the gate closes. The solution to this is to include two process factors - LNAF and SIFF. These design parameters deter the TSOs' optimisation tool from scheduling early commitment actions in the scheduling process, by making such actions artificially more expensive to the optimisations and instead allowing more time for the ex-ante markets to resolve the energy supply/demand balance.

### 3.2. Function of LNAF and SIFF in the Scheduling Tool

The LNAF and SIFF apply a weighting to the start cost of the offline generators to deter the TSOs' scheduling tool from taking early commitment actions in the scheduling process's optimisation. These parameters force the optimisation to favour short-notice units over long-notice units as short-notice units will appear to the scheduling processes to cost less than long-notice units. These parameters lead to the TSOs not to commit long-notice units early over short-notice units. Therefore, given the choice of several resources with the same cost, by applying the LNAF and SIFF, the shorter notice resources will be favoured in the scheduling processing tool.

These units with long notice requirements will have an additional incentive to trade in the intraday market rather than wait to be scheduled by the TSOs. The LNAF and SIFF could also incentivise units to reduce their notice times where this is technically and economically feasible.

The process and calculation methods by which the LNAF and SIFF are incorporated into the scheduling tool is outlined in Appendix A below.

<sup>&</sup>lt;sup>1</sup> Means commercial offer data in respect of a Generator Unit submitted under Chapter D and as described in Appendix I: "Offer Data" of the <u>Trading and Settlement Code</u>.

#### 3.3. Changes to the Power System since the Last Consultation

The following changes have been made to the power system since the last consultation.

- Greenlink Interconnector went commercially live for implicit SEM-GB auction on trade date 30<sup>th</sup>
  January 2025.
- Since the beginning of 2024, three OCGTs have been commissioned across Ireland and two have been commissioned in Northern Ireland. Additionally, three more OCGTs are expected to commence operations in Ireland by the end of 2026. Two Temporary Emergency Generators (TEGs) have been commissioned since the last consultation. Two more TEGs have been energised and will soon be commissioned.
- Moneypoint coal units (MP1, MP2 and MP3) have been retained on Targeted Contracting Mechanism.
   All three units will exit the capacity market at the end of June 2025 and become available as non-market units from 1st July 2025.
- Following the go-live of the Scheduling and Dispatch Programme (SDP), batteries are expected to
  play a more prominent role in short-notice dispatch within the SEM. This increased flexibility is
  anticipated to reduce the need for early commitment actions by the TSO optimisation tool in the
  scheduling process.
- Solar generation has seen significant growth compared to last year, both in large-scale utility
  projects and embedded solar systems. These changes have been considered in the context of this
  year's consultation.

# 4. LNAF and SIFF Parameter Review

TSOs have carried out a review of the scheduling processes based on the intent of the LNAF and SIFF parameters. This review focused on the parameters in the context of current security of supply concerns, the policy changes shifting to a minimum of 7 large online sets and the outcomes of the Scheduling and Dispatch audit. TSOs continue to find no justification or supporting evidence to warrant any changes at this time. Accordingly, TSOs consider it prudent to maintain these parameters at zero, with a view to reassessing the position at a future date.

Table 2 below outlines a summary of the findings of this review and the justifications for keeping the LNAF and SIFF parameters at zero, as per last year's recommendation.

Area of Analysis		Summary of Findings resulting in the Recommended Values		
		There is currently a risk to security of supply. At present when the wind and solar generation is low, there are limited unit options to choose from, whether they are longer notice or shorter notice units. The TSOs' optimisation tool does not often have the flexibility to choose between either taking an early action by committing a long-notice unit or favouring balancing supply with short-notice units. Therefore, there is limited opportunity of taking early actions and so a reduced concern about TSOs taking early actions.		
		A move to non-zero LNAF and SIFF parameters in the scheduling tool would, at times, result in the optimisation tending to schedule more shorter notice units to provide energy and reserve. If the notification times pass for the longer notice units, these long-notice units would become unavailable for commitment in the scheduling tool.		
1	Security of Supply: Lack of Generator Unit Choice	During transition periods from high wind to low wind, non-zero LNAF and SIFF would somewhat increase the risk to securing the system as the few available offline long-notice units would be run less, be in cooler heat states and thus less reliable to start when required. There has been a sustained increase in large-scale and embedded solar generation over the last few years. As with wind before it, solar is displacing conventional units resulting in longer notice units being off more often and for longer periods. In this context, the application of non-zero LNAF and SIFF may potentially add to the challenge of securing the system while integrating further intermittent generation.		
		If particular abnormal events occur (i.e. tripping of a large unit), non-zero LNAF and SIFF would increase the reliance on the fewer short-notice units that are not already committed and increase risk of not meeting the demand requirements during the start-up periods of the long-notice units that are in cooler heat states, when they are called to replace the original tripped unit. This may lead to a potential system alert.		
		Non-market generation has been procured by EirGrid on a temporary basis under the direction of the Commission for Regulation of Utilities (CRU). These Temporary Emergency Generation (TEG) units are activated under strict conditions when the system would have otherwise entered Alert or Emergency state. The treatment of TEG in system and market operations has been designed with objectives that include minimizing, as far as possible, the need to dispatch these units.		

Area of Analysis		Summary of Findings resulting in the Recommended Values		
		This objective is being respected through alternative procedures to the use of non-zero LNAF and SIFF in the scheduling process.		
		Moreover, temporary retention of the Moneypoint Units (MP1, MP2, MP3) serves a crucial role in maintaining adequacy of supply, ensuring stability while new capacity is introduced through the Capacity Remuneration Mechanism. These units will only be dispatched when necessary to maintain grid reliability and stability. Since they will not participate in the ex-ante markets, they will not contribute to standard market-based scheduling, which impacts price formation and dispatch strategies. The exclusion of these units from regular dispatch operations is expected to further discourage the use of non-zero LNAF and SIFF.		
	Security of Supply: Generation Reliability	Some Security of Supply Transmission Constraint Groups (TCGs) have been retained in the scheduling tool to manage the tight generation margins and improve the availability of conventional generation during periods of peak demand. This is currently being applied for Northern Ireland.		
2		Security of Supply constraints are being applied to ensure that all the generating units required to meet a stability TCG are not located at one location. This is to ensure that other units remain synchronized and available at a later stage to support the power system during periods of tight margins.		
		These interventions are more significant and direct than the intent of LNAF and SIFF. Therefore, the application of non-zero LNAF and SIFF would not be an alternative.		
	Security of Supply: Interconnector Uncertainty after Day-Ahead	Since the 31st of December 2020, the day-ahead market does not include any GB-SEM interconnection capacity. As a result, the TSOs do not receive day ahead interconnector schedules for Moyle, EWIC and Greenlink.		
3		There is a risk that the intraday markets may fail to schedule sufficient imports into the SEM during the periods of low generation margins. To mitigate this risk, the TSOs set the flows on the interconnectors to zero in the day ahead scheduling. This, at times, may result in scheduling the commitment of an additional long-notice unit. Such a procedure has greater significance than what was envisaged during the design of the LNAF and SIFF parameters and overshows any application of non-zero LNAF and SIFF.		

Area of Analysis		Summary of Findings resulting in the Recommended Values		
4	Minimum 7 Units Online Policy Change	To manage the dynamic stability, at least 7 conventional units must be on-load, at any one time, on the island. An operational constraint imposed in the scheduling process ensures seven units are on-load. This constraint shall become more pronounced with the exit of Moneypoint units from the Market. In the event of renewable generation decreasing suddenly, an eighth conventional unit may need to be instructed to synchronize. If the LNAF and SIFF parameters are set to non-zero, the optimisation may delay scheduling the commitment of an eighth conventional unit and therefore there is an increased risk that the offline units would have longer notification times (as they will be colder) and would be slower and less reliable to balance demand. The risk posed by moving to non-zero LNAF and SIFF is increased by the change in operational policy reducing to a minimum of 7 large sets online. This could lower the system's inertia. Therefore, TSOs would be reluctant to recommend non-zero LNAFF or SIFF parameters.		
5	Scheduling & Dispatch Audit	The outcomes of each of the SEM scheduling and dispatch process audits have not noted a concern in relation to the TSOs' taking early actions and have not made recommendations related to a change from non-zero values of LNAF and SIFF.		

Table 2: LNAF and SIFF key considerations.

TSOs have also reviewed the notice times of units at present compared to 2018 following the go live of ISEM and the introduction of the LNAF and SIFF parameters.

Although there has been no significant reduction in individual unit notice times, since 2024, a number of 'short notice time' units have been commissioned, and there are further plans for the commissioning of new OCGT units by end of 2026 (as per Section 3.3). The introduction of these short notice time units will reduce the standard notice time when viewed across the full portfolio of units. This trajectory of new units with shorter notice time will reduce the criticality of bringing in the LNAF and SIFF parameters, as the early action time is reduced with the reduction in notice times of units.

# 5. Parameter Recommendations

Based on the points outlined in Table 2 above, the proposed values for the parameters used in the calculation of the LNAF and SIFF for the calendar year 2026 remain unchanged to those of 2025 and are set out in *Table* 3.

Scheduling and Dispatch Policy Parameter	Recommended Value
LNAF	0
SIFF	0

Table 3: Recommended LNAF and SIFF values for the calendar year 2026.

# 6. Appendix A

If the LNAF and SIFF parameters are non-zero and enabled within the scheduling tool, the values are determined and effected in the scheduling tool as outlined in the steps and example below.

#### Step 1: Set Values for LNAF

The values for LNAF are set per Notification Time (NT) interval in hours as shown in *Table 4* and illustrated in *Figure 1: Graph for illustration purposes. Figure 1* below. This data is entered into the TSOs scheduling tool.

NT (hours)	LNAF
0.00	0.000
0.25	0.000
0.50	0.000
0.75	0.000
1.00	0.000
1.25	0.002
1.50	0.004
1.75	0.006
2.00	0.008
:	:
24.00	0.184

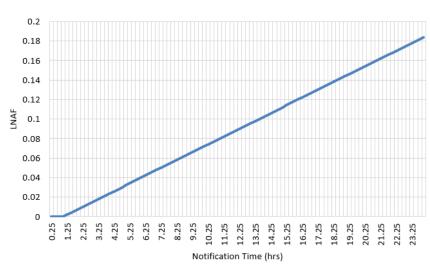


Figure 1: Graph for illustration purposes.

Table 4: LNAF values.

Each unit has an LNAF corresponding to the notifications time associated with each heat state as shown in Table 5: Example of Unit A's LNAFs below.

Unit A Heat State	NT (hours)	LNAF
Hot	4.00	0.024
Warm	6.00	0.040
Cold	8.00	0.056

Table 5: Example of Unit A's LNAFs

#### **Step 2: Determination of SIFF**

Once the Day Ahead Market results have been provided to the TSOs (13:30 day-ahead), if a shortfall exists, the SSII is calculated as the ratio of the total of any energy shortfall over the trading day (the sum of energy shortfalls in each period) divided by the total energy forecast for the trading day.

The SIFF corresponding to the calculated SSII, as shown in *Table 6* and illustrated in *Figure 2* below, is entered into the TSOs' scheduling tool.

SSII	SIFF
0.000	0
0.005	0.3
0.010	0.4
0.015	0.6
0.020	0.8
0.025	0.9
0.030	1.1
0.035	1.3
0.040	1.35
:	:
1.000	2

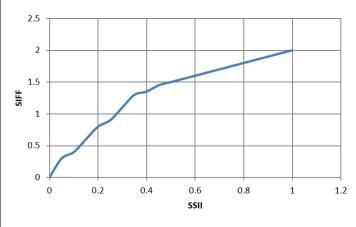


Figure 2: Graph for illustrative purposes.

Table 6: SSI and SIFF mapped values.

#### Step 3: Determination of Start-Up Cost used in the Scheduling Tool

Following the determination of the LNAF and SIFF, the start-up costs for each heat state of each unit for application in any unit commitment run will be determined using the following formula:

Start Up Costs in Scheduling Run = Submitted Start Up Cost \* [1 + (LNAF \* SIFF)]

#### **Example Calculation**

The worked example in *Table 7*below uses the LNAF and SIFF parameters outlined in Step 1 and 2 above and demonstrates how the LNAF and SIFF effects the scheduling process.

Display			
Calculated SSII	0.04		
Corresponding SIFF	1.35		
Heat State	Cold	Warm	Hot
Unit A Submitted Heat State Start Up Costs	12852	10710	8568
Technical Offer Data (TOD) Start Up Times	8	6	4
LNAF corresponding to TOD Start Up Times	0.056	0.040	0.024
SIFF	1.35	1.35	1.35
Calculated Start Up Cost for Unit A for each Heat State:	13823	11288	8845

Table 7:Calculated start-up cost for Unit A with LNAF and SIFF at non-zero.

The calculated start-up cost for Unit A for each heat state in Table 7 above is included in the scheduling tool optimisation. In the scenario where there is a system energy shortfall, the higher start-up cost for Unit A when it is offline in a cold state deters the TSOs optimisation tool from taking early commitment actions in the scheduling process and instead allowing more time for the ex-ante markets to resolve the energy supply/demand balance.