

FERA Response to Imperfections Charges Consultation SEM-24-048

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FERA's members operate in the Demand Side Response sector of the electricity industry, including aggregation of generators, and perform a significant role in supporting the operation of the I-SEM balancing market and facilitating the continuous introduction of renewables. They have significant experience in working with SONI and Eirgrid to provide stability and balance to the system operations. The FERA members have together a registered capacity circa 200MW, which carries a significant contribution to system support and stability.

The following comments are in relation to the published SEMC consultation and clause reference numbers are used where possible.

Comments

FERA notes that the consultation paper approach to 'Energy Payments for DSUs' is similar to that proposed in last year's consultation (SEM-24-048). We therefore would draw attention to FERA's response to that consultation. We shall not reiterate here what we have already provided to and informed the SEMC of.

We would express our deepest concern over the length of time that this matter has been examined by the TSOs and the SEMC. This was to be implemented at the later part of 2023 and now the TSOs are suggesting again the removal of the payment from the budget for 2025/26. This was a recommendation from Europe and the SEMC had initiated a workstream to deliver it. FERA would reiterate that the delay has been somewhat frustrating and the indications within this paper are altogether worrying.

The SEMC should be aware of the obligations under

- EUs Clean Energy Package
- Article 17(1) of the Electricity Directive
- Article 6(1)(a) of the Electricity Regulation

FERA is concerned over the continued delay in facilitating energy payments to DSUs and the exclusion of such within the Imperfection Charges for next year is deeply disappointing