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5th September 2025

RE: SEM-25-044 - Consultation on SEM Scheduling and Dispatch Parameters 2025/26 (“the Consultation”)

Dear Caroline & T&SC Team,

Bord Gáis Energy (BGE) welcomes the opportunity to respond to the Consultation¹ on SEM Scheduling and Dispatch Parameters 2025 (SEM-25-054) relating to the proposed values for the Long Notice Adjustment Factor (LNAF) and System Imbalance Flattening Factor (SIFF) for 2026.

In principle, BGE believes the LNAF and SIFF parameters should be set to non-zero values, as originally intended during the market design phase. These parameters were designed to make it less attractive to call on units too early so as to allow the market to decide the outcome as much as possible.

While we appreciate the analysis provided in the **SEM-25-044a Report to Regulation**, we note that it does not address what would need to change for LNAF and SIFF to be implemented as originally envisaged. We believe this is a critical gap in the current reporting approach. In particular, we would welcome clarification on two statements in the report that appear to be in tension:

1. The report states: *“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.”* - Section 4, Table 2 – Area of Analysis 1
2. Yet the TSOs Review of Recommended Values for Scheduling and Dispatch Policy Parameters 2026 states that: *“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..”* - Section 4, final paragraph

This suggests that while back-up flexibility is currently insufficient to warrant non-zero values, it is expected to improve materially in the near term. BGE would welcome insight from the TSOs with regards to their understanding of:

¹ <https://www.semcommittee.com/news/scheduling-and-dispatch-parameters-consultation-paper-2025>

- The conditions under which LNAF and SIFF could be set to non-zero values
- Any system upgrades or operational changes required to enable this.
- Whether any such changes are already planned or underway.

Greater transparency regarding the potential evolution of these parameters is needed to inform future investment decisions. We would welcome this insight on an annual basis until a transition to non-zero parameters is feasible. Additionally, once enabling conditions are in place, we would support a full impact assessment to ensure any change remains in the best interest of consumers.
BGE

I hope you find this response useful. Please let me know if further discussion would be helpful.

Yours sincerely,

Niamh Trant
Regulatory Affairs – Commercial
Bord Gáis Energy