



**Single Electricity Market
(SEM)**

Capacity Market Code Modifications

Workshop 43

CMC_09_25 and CMC_14_25

Decision Paper

CMC_09_25:	Registration and Qualification Auction Timetable Milestones
CMC_14_25:	New Dates in the Capacity Auction Timetable

SEM-25-072

17 December 2025

EXECUTIVE SUMMARY

The purpose of this decision paper is to set out the decisions relating to one of the six proposed Modifications to the Capacity Market Code (CMC) discussed at Workshop 43 (Part A), held on 28 May 2025, and one of the six proposed Modifications to the CMC discussed at Workshop 43 (Part B), held on 09 June 2025. These are:

- **CMC_09_25:** Registration and Qualification Auction Timetable Milestones
- **CMC_14_25:** New Dates in the Capacity Auction Timetable

The decisions within this paper follow on from the associated consultation for Workshop 43 (Part A), [SEM-25-023](#), which closed on 03 July 2025, and Workshop 43 (Part B), [SEM-25-027](#), which closed on 17 July 2025. The decision paper for four of the six other Modification Proposals discussed at Workshop 43 (Part A), [SEM-25-045](#), and the decision paper for four of the six other Modification Proposals discussed at Workshop 43 (Part B), [SEM-25-046](#), were published on 29 August 2025.

Fourteen responses were received to the Workshop 43 (Part A) consultation, of which, one was confidential.

Fourteen responses were received to the Workshop 43 (Part B) consultation, of which, one was partially confidential.

Summary of Key Decisions

Following consideration of the proposal and the responses received to the consultation, the SEM Committee have decided:

Modification	Decision	Implementation Date
CMC_09_25: Registration and Qualification Auction Timetable Milestones	Make a Modification	Effective on publication
CMC_14_25: New Dates in the Capacity Auction Timetable	Make a Modification	Effective on publication

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1. OVERVIEW

1.1. BACKGROUND

- 1.1.1. The SEM CRM detailed design and auction process has been developed through a series of consultation and decision papers, all of which are available on the SEM Committee's website. These decisions were translated into legal drafting of the market rules via an extensive consultative process leading to the publication of the Trading and Settlement Code (TSC) and the Capacity Market Code (CMC). Current versions of the CMC and the TSC are published on the SEMO website.

Process and Timeline for the Modification Proposals

- 1.1.2. On 19 May 2025, the System Operators (SOs) submitted one Modification Proposal (CMC_09_25) under the terms of B.12.4 of the CMC.
- 1.1.3. On 30 May 2025, the Regulatory Authorities (RAs) submitted one Modification Proposal (CMC_14_25) under the terms of B.12.4 of the CMC.
- 1.1.4. The RAs reviewed both Modification Proposals and determined that they were not spurious as per B.12.6.1 of the CMC.
- 1.1.5. On 05 June 2025, the RAs determined the procedure to apply to the Modification Proposals. An overview of the timetable is as follows:
- i. The SOs convened Workshop 43 (Part A) where CMC_09_25 was discussed on 28 May 2025, alongside five other proposals of which four have been decided upon¹. The SOs convened Workshop 43 (Part B) where CMC_14_25 was discussed on 09 June 2025, alongside five other proposals of which four have been decided upon².
 - ii. The SOs, as set out in B.12.7.1 (j) of the CMC, prepared reports³ of the discussions which took place at both sittings of Workshop 43, provided the reports to the RAs, and published them on the Modifications website promptly after.
 - iii. The RAs then consulted on the Modification Proposals from the date of publication of the consultation papers until the closing dates of Thursday 03 July 2025 (for Workshop 43 Part A) and Thursday 17 July 2025 (for Workshop 43 Part B).
 - iv. As set out in B.12.11.6, the RAs shall make their decision as soon as reasonably practicable following conclusion of the consultation and publish a report in respect of their decision. The purpose of this decision paper is to set out the decisions relating to one of the six Modification Proposals discussed during Workshop 43 (Part A) and one of the six Modification Proposals discussed during Workshop 43 (Part B) to:

¹ [SEM-25-045](#) – decision on CMC_04_25, CMC_05_25, CMC_06_25 and CMC_07_25 (CMC_08_25 outstanding).

² [SEM-25-046](#) – decision on CMC_10_25, CMC_12_25, CMC_13_25 and CMC_15_25 (CMC_11_25 outstanding).

³ [Capacity Modifications Workshop 43 Report v1.0.pdf](#) and [Capacity Modifications Workshop 43B Report 0.pdf](#).

- a) Make a Modification;
- b) Not make a Modification; or
- c) Undertake further consideration in relation to the matters raised in the Modification Proposal.

1.1.6. This decision paper provides a summary of the consultation responses and sets out the SEM Committee's decisions.

1.2. RESPONSES RECEIVED TO CONSULTATION

1.2.1. This paper includes a summary of the responses made to Capacity Market Code Modifications Workshop 43 (Part A) Consultation Paper ([SEM-25-023](#)) and Workshop 43 (Part B) Consultation Paper ([SEM-25-027](#)) in relation to CMC_09_25 and CMC_14_25 only.

1.2.2. A total of 14 responses were received to consultation SEM-25-023, of which one was marked as confidential and of which five commented on CMC_09_25. The non-confidential responses which commented on CMC_09_25 are from:

- Bord Gáis Energy Limited (BGE)
- EirGrid plc and SONI Limited (SOs)
- EP UK Investments (EPUKI)
- ESB Generation and Trading (ESB GT)
- SSE

1.2.3. A total of 14 responses were received to consultation SEM-25-027, of which one was marked as partially confidential and of which eight commented on CMC_14_25. The non-confidential responses which commented on CMC_14_25 are from:

- BGE
- Energia
- EPUKI
- ESB GT
- Federation of Energy Response Aggregators (FERA)
- iPower Flexible Energy (iPower)
- SOs
- SSE

2. CMC_09_25 – REGISTRATION AND QUALIFICATION AUCTION TIMETABLE MILESTONES

2.1. CONSULTATION SUMMARY AS PRESENTED BY THE SOS

- 2.1.1. To facilitate efficient operation of the Capacity Market Platform (CMP) for qualification applications to the relevant Capacity Auction, this Modification Proposal seeks to introduce two new Capacity Auction Timetable milestones defined as the 'Participation Notice Closing Date' and the 'Qualification Application Opening Date'. The Modification Proposal is also concerned with the transition from the existing process of manual submission of Applications for Qualification via email to the new process of using the CMP.
- 2.1.2. To facilitate these proposed changes, provisions in Sections E.3, E.4, E.7 and the Glossary of the CMC are proposed to be modified. Additionally, Agreed Upon Procedure 3 will be modified to reflect the CMC changes.
- 2.1.3. According to the SOs, this Modification Proposal will facilitate greater efficiency in managing qualification applications via the CMP while also permitting 'batch' processing of applications and earlier engagement with Participants regarding any further application information required.

2.2. RESPONSES TO MODIFICATION PROPOSAL

- 2.2.1. Five out of 14 non-confidential responses commented on this proposal.
- 2.2.2. BGE stated that the Modification Proposal should not apply to the T-4 2029/30 auction given that the timetable has already been published and industry would have based investment decisions and plans on this timetable.
- 2.2.3. BGE further stated that going forward, the IAIPs should be published eight weeks earlier (at A-34 weeks) to provide sufficient time for industry to internally decide on submitting an Application for Qualification.
- 2.2.4. ESB GT viewed the Modification Proposal as a welcome development in the administration of the CRM, where it stated that it will facilitate the batch processing of qualification applications from and including the T-4 2029/30 auction and allow for more efficient engagement. It also stated that it understood the current existing processing timelines will continue to apply.
- 2.2.5. EPUKI was of the view that the Modification Proposal had been raised too late for implementation ahead of the T-4 2029/30 auction and outlined that in its view, it cannot possibly be achieved without adding dates to the IAIP after those dates have already expired. It noted that the timetable for this auction has already been published and thus expressed concern around raising a proposed Modification to amend the timetable at this time.
- 2.2.6. EPUKI also requested that the four-week window for submission of qualification applications be included in the main body of the CMC. It noted in its view that since the timetable is only

indicative, there is a risk that this period could be shortened and that sufficient time is critical to prepare and submit qualification applications.

- 2.2.7. The SOs stated that this Modification Proposal intends to provide more structure around the timelines by which participants may submit applications, improving efficiency in managing qualification applications via the CMP. This approach will also permit batch processing, benefitting all stakeholders.
- 2.2.8. SSE was broadly supportive of this Modification Proposal and stated that a move towards electronic applications is an improvement. SSE also asked if industry could be involved in user testing if not yet conducted and if training and guidelines can be provided as soon as possible to allow for sufficient time for senior management to sign off on an application. It further stated that clarification was needed on the registration requirements for new units to ensure they are registered appropriately ahead of submitting a qualification application.

2.3. SEM COMMITTEE DECISION

- 2.3.1. The SEM Committee welcomes the feedback provided by Participants both as part of the workshop and through the consultation process.
- 2.3.2. The SEM Committee also welcomes efforts from the TSO to modernise the structure around the submission of qualification applications to the CRM.
- 2.3.3. Overall, the SEM Committee is content to approve this Modification Proposal, effective from the T-1 2026/27 auction onwards. For the avoidance of doubt, this Modification does not apply to the T-4 2029/30 auction. Following the publication of this decision, the SOs will submit an updated T-1 2026/27 timetable for RA approval.
- 2.3.4. Most of the feedback received from industry related to the implementation timeline (i.e. calls for this proposal not to be implemented ahead of the T-4 2029/30 auction) or comments regarding the introduction of the proposal (e.g. regarding guidelines for industry in relation to using the new platform).
- 2.3.5. The SEM Committee notes the comment from one respondent regarding the proposed window between the Qualification Application Opening and Closing Dates. The SEM Committee understands the importance to Market Participants of having sufficient time between these dates and would not intend to shorten this window in future auctions. Therefore, the SEM Committee considers the current legal drafting to be appropriate in this regard.
- 2.3.6. The SEM Committee notes feedback from industry regarding guidelines for using the new Capacity Market Platform. The RAs have engaged with the SOs, who have noted that updates have been provided at various CMC Modification workshops over the past few months and that training and information sessions have been conducted with industry to allow for a smooth transition to the Capacity Market Platform. Concerning the specific milestones introduced via this Modification Proposal, the SOs have agreed to publish a market message explaining the changes shortly after the publication of this decision paper, once a revised timetable has been published.

- 2.3.7. In light of scrutiny conducted by the RAs and comments from two respondents stating that the timelines for acceptance of this Modification do not accord with the current auction timelines, as noted above, the SEM Committee has decided not to implement this Modification Proposal ahead of the upcoming T-4 2029/30 auction. Instead, the Modification will apply to the upcoming T-1 2026/27 auction and beyond. This decision is effective upon publication, which the SEM Committee considers will provide industry with sufficient notice to prepare as necessary for these newly introduced milestones.
- 2.3.8. Finally, the SEM Committee notes a comment made by one respondent to extend the IAIP publication to A-34 weeks. The SEM Committee considers this suggestion to be outside of the scope of this Modification Proposal but notes that this would likely be challenging from an operational perspective.

3. CMC_14_25 – NEW DATES IN THE CAPACITY AUCTION TIMETABLE

3.1. CONSULTATION SUMMARY AS PRESENTED BY THE RAS

- 3.1.1. This Modification Proposal seeks to introduce new dates (events) in the Capacity Auction Timetable to place a requirement on the SOs to submit “indicative” Locational Capacity Constraint (LCC) volumes (noted as Part 1 in the Modification Proposal Form) and SO proposed adjustments to the Final Capacity Requirement to the RAs (noted as Part 2 in the Modification Proposal Form) by certain dates.
- 3.1.2. The Modification Proposal proposed to achieve this by introducing a new paragraph under Chapter C, including additional wording to F.4.1.1 (a) and F.4.1.5, and new events in Table A, Appendix C of the CMC.
- 3.1.3. According to the RAs, the proposed changes are administrative in nature.

3.2. RESPONSES TO MODIFICATION PROPOSAL

- 3.2.1. Eight out of 14 non-confidential responses commented on this proposal.
- 3.2.2. BGE stated it supported the proposal but requested that the reference to “*for the first time*” be deleted and that earlier information (A-25 weeks) on LCCAs should also be provided to Market Participants to enhance transparency and investment signals.
- 3.2.3. BGE also requested that any changes in LCCA values between the time of submission of LCCA values to the RAs and the final figures for LCCA values should be transparently reported in the Volumes paper issued after each Capacity Auction.
- 3.2.4. Energia noted that the Panel of Technical Experts (PTE) that will review the proposed capacity requirements for CRM auctions will not be in place for the T-4 2029/30 auction and considered

that the implementation of a Modification that would require the SOs to submit final LCCA requirements earlier than is currently required is inappropriate while the PTE is yet to be implemented. Furthermore, it stated that the SOs identified a need for additional resource in their consultation response on PTEs and stated that placing further burden on them to submit capacity requirements earlier may not be appropriate at this time either.

- 3.2.5. Energia also stated that it would not support the implementation of this proposal ahead of the T-4 2029/30 auction, to allow the TSO impact assessment to take place and be assessed in full.
- 3.2.6. EPUKI stated it had no strong views on the proposal and in general, welcomed greater transparency around constraints to be applied with information on them being made available to Participants as early as possible in the process.
- 3.2.7. EPUKI also highlighted that locational constraints were originally included in the CRM design as a transitional mechanism and noted that Price Review 5 included an incentive for EirGrid to resolve the Dublin constraint during the price review period (2020 – 2025). It stated it was disappointed that during this period the constraint situation has deteriorated with new maximum volume constraints being introduced in Dublin and new constraints being proposed in other regions. In its view, the continued impact of constraints on the Capacity Market is concerning and the Modification Proposal would codify the process around calculating constraints, which is indicative of a wider trend of an increasingly constrained CRM.
- 3.2.8. ESB GT agreed that the proposed Modification is consistent with CMC Objectives (b) and (e) and stated it was supportive of the proposal, which it believes will allow more time for the RAs to scrutinise (indicative) LCC volumes proposed by the SOs.
- 3.2.9. ESB GT also stated that it would urge the RAs and SOs to make the volume requirements available to Market Participants as early as possible to allow for sufficient time to prepare for the auction and avoid possible Qualification Disputes in relation to perceived (or forecast) system constraints.
- 3.2.10. FERA noted the RAs' comment in the workshop that the PTE may not be in place for the next (T-4 2029/30) auction and stated this suggests more time can be taken over decisions on the proposal.
- 3.2.11. FERA also stated that obtaining any information on LCCAs in advance of an auction would be welcomed, but a level of certainty/uncertainty attached to such information by the SOs is needed. It also noted the information is only for the RAs and not Participants.
- 3.2.12. iPower considered earlier LCC submissions to be helpful but stated that it may raise SO workload and still leave the RAs with limited review time if delays occur. It also noted that Participants risk misinterpreting early figures or rushing preparations without flexibility. In its view, the value of early data depends on visibility, clarity and platform updates.
- 3.2.13. iPower suggested that the proposal could be improved by publishing indicative values, providing interpretation guidance and adding context or confidence levels to avoid misinterpretation.

- 3.2.14. The SOs stated that as drafted, CMC_14_25 represents a significant change to existing processes and that the proposal in their view, would not deliver on its intent. They suggested that to provide reasonably indicative LCC data at IAIP stage would require nearly a doubling of SO resources as the fundamental processes would need to be duplicated with value definition activities (including DRFs from the RAs) commencing six weeks earlier than present. Furthermore, in the SOs' view, the LCC data provided at this stage, while indicative, may ultimately be of limited benefit to the RAs for assessment purposes.
- 3.2.15. The SOs also stated that certain adjustments would not be feasible to provide at earlier stages as there are dependencies on relevant auction qualification results and preceding auction results. As such, the SOs proposed an alternative approach which they stated would enable earlier data sharing and facilitate better understanding of the adjustments in advance of Table F.4.1.1. submission and considered this approach to be of more benefit to the RAs in assessing final volumes.
- 3.2.16. SSE stated it supported this proposal and would welcome the provision of indicative LCC volumes information as early as possible in the process. It further stated that it appreciates that final LCC information may vary from this e.g. due to terminated contracts, and that this final information will be submitted along with Qualification Decisions to the RAs. However, it considered that this information should also be made available to Market Participants as soon as it is available.

3.3. SEM COMMITTEE DECISION

- 3.3.1. The SEM Committee welcomes the feedback provided by Participants both as part of the workshop and through the consultation process.
- 3.3.2. The SEM Committee notes comments from respondents that it would be inappropriate to make changes for the T-4 2029/30 auction, while the Panel of Technical Experts is yet to be fully implemented. The SEM Committee acknowledges this point but disagrees with the notion that the PTE is required for this Modification Proposal to deliver any benefits given the RAs already closely scrutinise volumes and adjustments submitted by the SOs. The SEM Committee considers that the proposed Modification will help with the process of setting volume requirements and notes that even if implementation of the PTE were delayed, it should not be a reason for this proposed process improvement to not be implemented.
- 3.3.3. The SEM Committee recognises the comment from one respondent that locational constraints were originally a transitional mechanism and the proposal at hand is seeking to codify the process around calculating constraints. The SEM Committee understands this comment is in relation to Part 1 of the Modification Proposal and agrees it is undesirable for constraints to continue to exist. However, the SEM Committee would note that the purpose of this proposal is to make the process of volume setting more efficient and ensure the RAs receive information earlier in the process, to allow greater time for analysis and scrutiny of the SOs' submissions. In any case, the SEM Committee has decided not to approve Part 1 of the Modification Proposal related to LCCAs and explains its rationale below.

- 3.3.4. In regard to the legal drafting, the SEM Committee notes the concerns raised by the SOs. The SEM Committee accepts that Part 1 of CMC_14_25 as consulted upon may create additional workload for the SOs and duplication of work to be undertaken. The SEM Committee notes the comment of one respondent that additional burdens should not be placed on the SOs and has made changes, in consultation with the SOs and in line with B.12.11.4, to the legal drafting to take forward Part 2 of the proposal only. The changes seek to define the two sets of adjustments submitted by the SOs to the RAs, being indicative adjustments and prospective adjustments, with the latter being dependent upon provisional qualification data and the former not. The dates by which these adjustments are to be provided have also been amended from what was consulted on.
- 3.3.5. The SEM Committee is of the view that this approach, i.e., providing the RAs with initial adjustments earlier, will deliver greater efficiencies in volume setting and decision-making. The SEM Committee acknowledges comments from some respondents regarding the earlier provision of information on constraints and LCCAs but considers that publishing information earlier, which would be indicative and subject to change, presents a risk of misinterpretation if treated as final. Furthermore, it should be noted that in the last three T-4 auctions, “Volumes Information Notes” have been published post-auction, summarising the SEM Committee’s decisions and the factors considered in determining the volumes procured. The SEM Committee intends to continue publishing these notes post-auction for the forthcoming T-4 auctions.
- 3.3.6. In finalising the legal drafting, the SEM Committee has also amended F.4.1.4 of the CMC to change the requirement for the SOs to submit values to the RAs under F.4.1.1 no later than fifteen Working Days after the Provisional Qualification Results Date, from two Working Days. This change was made to reflect operational realities.
- 3.3.7. The SEM Committee also recognises that the introduction of two new Capacity Auction Timetable events merits the addition of these events to Agreed Procedure 3 and, as such, added the defined terms to Agreed Procedure 3 to reflect the new CMC changes.
- 3.3.8. For the avoidance of doubt, this Modification does not apply to the T-4 2029/30 but will be effective from the T-1 2026/27 auction onwards. Following the publication of this decision, the SOs will submit an updated T-1 2026/27 timetable for RA approval.
- 3.3.9. Based on the reasons outlined above, the SEM Committee accepts CMC_14_25, with the amendments discussed above.

4. NEXT STEPS

- 4.1.1. The SEM Committee will make Modifications CMC_09_25 and CMC_14_25 using the appended legal drafting. The proposals will be effective for the T-1 2026/27 auction onwards.
- 4.1.2. All SEM Committee decisions are published on the SEM Committee website, available here: www.semcommittee.com.