



iPower Comments on **SEM-26-009 CMC Workshop 47 Consultation** closing **31.03.2026**

iPower Flexible Energy participates actively in both the Aggregated Generator Unit (AGU) and Demand Side Unit (DSU) sectors of the electricity industry. Through these activities, iPower plays a significant role in supporting the operation of the I-SEM balancing market and facilitating the continued integration of renewable generation.

iPower currently operates approximately 100 MW of flexible capacity, providing a material contribution to system support and stability. We have experience working collaboratively with SONI and EirGrid to support secure and balanced system operations. In addition, iPower is a member of FERA, whose members collectively represent circa 200 MW of registered capacity across the island.

iPower welcomes the opportunity to provide feedback on SEM-26-009.

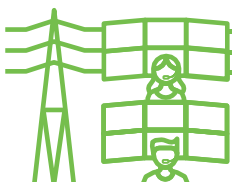
The proposed modification seeks to mitigate potential gaming behaviour by new generation projects that, having achieved Substantial Financial Completion (SFC), could terminate and re-enter future auctions at higher prices.

DSUs and AGUs reach SFC via the Proof of Contract mechanism, which is distinct from the construction-based milestones applicable to new-build generation. The addition of sites for DSUs/AGUs typically involves only the installation of communications and control infrastructure, with delivery timelines measured in weeks rather than years, as the underlying assets are already operational and grid-connected.

The existing SFC process for demand-side units through the Proof of Contract process was designed to facilitate participation by demand-side resources, particularly in four-year-ahead auctions aligned with new-build generation timelines. Absent an explicit exemption, the proposed restriction would undermine this and create barriers to DSU/AGU participation, despite these units being best placed to participate in T-1 auctions due to their inherent flexibility.

Furthermore, the application of the "Same Capacity" definition presents practical challenges in the context of demand-side participation. DSUs and AGUs are dynamic aggregations by nature and their composition can evolve over time as individual sites are added, removed, or substituted. This points to a fundamental misalignment between the definition as currently framed and the operational reality of aggregated demand-side resources.

This misalignment is not limited to DSUs and AGUs alone. As the energy landscape evolves,



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new technologies and participation models, such as Demand Consumption Units (DCUs), are emerging that share the same dynamic and aggregated characteristics. Applying the proposed restriction to these unit types would risk creating a structural barrier to the participation of innovative and flexible technologies that the capacity market should, in principle, be seeking to encourage.

Therefore, iPower proposes that DSUs, AGUs, and comparable emerging technology unit types, including DCUs, should be exempt from the provisions in question and suggests the following clause be included to reflect this broader exemption:

Proposed Draft Exemption:

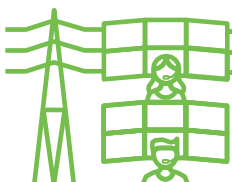
New Clause J.6.1.10 (c) – Demand Side Units and Aggregated Generator Units and comparable emerging technology unit types, including Demand Consumption Units (DCUs).

The provisions of J.6.1.10 relating to termination following the achievement of Substantial Financial Completion shall not apply to Capacity Market Units classified as Demand Side Units (DSUs) or Aggregated Generator Units (AGUs) or comparable emerging technology unit types, including Demand Consumption Units (DCUs).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M O'Kane', positioned above a horizontal line.

Matt O'Kane
CEO
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