



The Single Electricity Market (SEM)

**Responses to Comments on the Agreed
Procedure Consultation, and outstanding
PRC issues**

Information Note

19th July 2007

AIP/SEM/07/421

1. Summary

Over several publication dates in May 2007, the Regulatory Authorities published the draft “Go-Active” versions of the Agreed Procedures. These Agreed Procedures were aligned with version 2.0 of the Single Electricity Market (SEM) Trading and Settlement Code (the ‘Code’). The Agreed Procedures consultation determined the minimum changes required to ensure that the Agreed Procedures were fit-for-purpose for Go-Active, i.e. that they were aligned with Version 2.0 of the Code. The final Go-Active versions of the Agreed Procedures were published on 25 June 2007. This information note publishes all responses to comments received during this consultation.

In parallel, the RAs, in conjunction with the System Operators, have been operating a Participant Readiness Coordinator (PRC) function. The PRC maintains a query log for participants. This log contains questions regarding possible improvements and errors within the Agreed Procedures. This information note contains responses to queries which may have been closed off as a result of the publication of the go-active Agreed Procedures, and note those which are still outstanding.

This note then collates the entire list of outstanding issues (from both the consultation and the PRC query log) with the Agreed Procedures in Section 3.

Section 4 summarises how each point will be brought forward.

2. Consultation Comments Received, and Responses

Comments received from the consultation on the base-lined draft Agreed Procedures fed into the final Go-Active versions. These comments and their responses are contained in Section 3. As the draft Agreed Procedures had been base-lined, changes to the draft Agreed Procedures were drafted in change request form, and placed through the change control process. Participants, through the Participant Representatives and the Project Manager’s Group forum, had the opportunity to comment on these change requests. These comments are also included in Section 3.

2.1 Actions Arising

Please note that the Regulatory Authorities do not intend to raise any Modification Proposals to the Modifications Committee related to the collated items in this document. It is for the members of the Modification Committee (or indeed any other member of the public) to review the collated list, and determine whether a Modification Proposal is necessary. Furthermore, it should not be construed that an issue raised to the Market Trial Working Group will be actioned as a Modification Proposal.

3. Responses to Comments

Please note that “Query was passed to the PRC / Mods Committee / Market Trial Working Group” means

- further clarifications were raised to the PRC if not already done so;
- comments that required changes to the APs or the Code are collated and published here, and brought to the attention of the Modification Committee; and/or
- comments that potentially may impact the market trial were collated here, and brought to the attention of the Market Trial Working Group.

3.1 Consultation Comments

#	Respondent	Ref.	AP	Comment	Response	Action
1	NIE		All	General comment - all definition sections should only include the items specifically required for definition within the particular AP, references to defined words "As defined in the code" should be removed.	In principle it has been decided that all defined terms should only be defined once and where other documents use the term then the other documents would refer to the master.	No action was taken
2	Synergen	(Page 39)	AP1	There is formatting error in the PDF - this page is blank.	Pdf conversions performed correctly this time	The AP was amended
3	Synergen	2.2 (Page 7)	AP1	This section states that Pumped Storage Units, aren't registered as a trading site – this section need to be expanded to detail now Pumped Storage Units are registered given that the interconnector units are described under the next sub-heading.	Agree that it should be included and described like Interconnector Units. Need to check to see if there are any other special rules for Pumped Storage Units.	The AP was amended

#	Respondent	Ref.	AP	Comment	Response	Action
	Synergen	2.3 (Page 8)	AP1	Synergen objects to this naming convention - parties / participants should be given meaningful names.	Objection noted but no changes can be made at this time. It shall be passed to the PRC for consideration.	No action was taken with respect to the AP. Query was passed to the PRC / Mods Committee / Market Trial Working Group.
4	SEMIT	3.1.2	AP1	Step 15 – timeline should read ‘ within 20 WD’s of receipt’ as per section 2.17 of the Code line 6	Amend to be consistent with the Code	The AP was amended
5	Synergen	3.1.2 step 3 (Page 11)	AP1	Revise this step to give parties freedom to pay the Accession Fee via either cheque or electronic transfer.	Requested change noted . It will be passed to the PRC for consideration.	No action was taken with respect to the AP. Query was passed to the PRC / Mods Committee / Market Trial Working Group.
6	Airtricity	3.2.1	AP1	(Last bullet point) The statement that CCQ must be carried out in respect of new Users is surely incorrect. CCQ is carried out for new Units, not Users. New Users simply go through the process of obtaining Digital Certificates as described in AP3.	Yes this is correct. The document will be amended	The AP was amended
7						

#	Respondent	Ref.	AP	Comment	Response	Action
	Synergen	3.2.1 2nd bullet point (Page 15)	AP1	This bullet point is confusing as drafted as should be amended as follows: <i>“The Party (or Applicant) either downloads a registration package from the SMO Website. The registration package includes the Participation Notice which can be used by <u>the</u> Party (or Applicant) to register its first or any subsequent Unit.”</i>	Agree with the suggested modification	The AP was amended
8	Airtricity	3.2.5	AP1	Step 4: This step skips ahead to step 32, which refers to a refund of Participation fees. This is obviously incorrect as there are no fees to refund at step 4. Possibly the correct reference should be step 29.	The step should be 29	The AP was amended
9	Airtricity	3.2.5	AP1	Step 15: The intent of this step is not clear and appears duplicative and unnecessary.	Step will be removed	The AP was amended
10	Airtricity	3.2.5	AP1	Step 16: This step seems out of flow. It would appear to be a deviation from step 12, except that it contradicts itself under the timing column – it assumes to have received the requested clarifications and yet goes on to say “If complete clarifications are not received...”	This is correct. At step 12 the Applicant provides the clarifications to the MO. Step 13 the MO passes the relevant clarifications to the SO/IA/MDP. At step 14 the SO/IA/MDP validate the clarifications and notify the MO if they are complete (from their perspective). At Step 16 the MO from its perspective and from the notified perspective of the SO/IA/MDP determines if the clarifications are complete. Steps will be amended to clarify the process.	The AP was amended
11						

#	Respondent	Ref.	AP	Comment	Response	Action
12	Airtricity	3.2.5	AP1	Step 25: This step literally jumps into the picture. No previous steps describe the MO calculating the required Credit Cover and notifying the Party of the same.	The Required Credit Cover may be communicated when confirming the Eligibility requirements. Alos Step 25 will refer to AP9 to post credit cover.	The AP was amended
13	Airtricity	3.2.5	AP1	Step 27: The timing 'Effective Date – 1WD' appears incorrect.	The existing text is correct. The purpose here is if the Required Credit Cover is not posted by the effective date then the effective date will be incremented to the next working day. In step 27 if this incrementing process has been going on for more than a year then a Deemed withdrawal notice is issued.	No action was taken
14	Synergen	3.7.1 (Page 35)	AP1	Typo: "The process commences when the Suspension Order is issued by the Market Operator to the Participant in respect of some or all its Units for reason of Default under the Code."	Agree with the suggested modification	The AP was amended
15	Airtricity	4.1	AP1	Functional Area: missing reference.	It will be added to the Definitions	The AP was amended
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#	Respondent	Ref.	AP	Comment	Response	Action
17	Synergen	4.1 (Page 36)	AP1	The definition of " <i>Functional Area</i> " requires amendment given the "Error! Reference source not found." Text within the current draft.	The spurious reference will be removed	The AP was amended
18	Synergen	4.1 (Page 37)	AP1	The requirement for a " <i>Digital Certificate</i> " with the "SMO Website" definition requires further clarification as it seems to indicate that all public data access will be controlled via a " <i>Digital Certificate</i> ".	Agree that the definition should be amended to ensure there is no reference to Digital Certificates.	The AP was amended
19	Airtricity	5.1.2	AP1	Contact Types What Contact Type can be defined as a primary contact – a FullContact, a MainContact or any Contact Type?	The Main Organisation contact has the same access rights as the Full User Contact. The Main Organisation Contact is the first User that is pre-loaded by the MO on registration. This User can then create other Users include Full Access Users.	The AP was amended

#	Respondent	Ref.	AP	Comment	Response	Action
	Synergen	5.1.2 (Page 40)	AP1	<p>The current segmentation of contact types is inappropriate and section 5.1.2 should be amended as follows to allow for a separate contact to manage banking matters:</p> <p>“At a minimum a Participant will have to define a primary contact, a scheduling contact, a <i>banking contact</i>, and a billing contact.</p> <ul style="list-style-type: none"> • Contact Types: • FullContact: Full access contact. • MainContact: Main organisation contact. • Invoicing: Financial, <i>and</i> invoicing and <i>banking</i> contact. • <i>Banking: banking contact.</i> • Settlement: Settlement and billing contact. • Trading: Scheduling contact. • Other: Contact for other functional areas.” 	This is a change to functionality of the MO systems. It shall be passed to the PRC for consideration.	No action was taken with respect to the AP. Query was passed to the PRC / Mods Committee / Market Trial Working Group.

#	Respondent	Ref.	AP	Comment	Response	Action
	Synergen	5.1.3 (Page 40)	AP1	<p>The current segmentation of user types is inappropriate and section 5.1.3 should be amended as follows to allow for a separate user to manage banking matters:</p> <p>“User Types is the selection of pre-defined roles providing access to specific Functional Areas.</p> <ul style="list-style-type: none"> • User Types: • FullUser: Full access User. • MainContact: Main organisation User. • Invoicing: Financial, <i>and</i> invoicing and banking User. • <i>Banking: banking User.</i> • Settlement: Settlement and billing User. • Trading: Scheduling User. • Other: Users for other Functional Areas. 	This is a change to functionality of the MO systems. It shall be passed to the PRC for consideration.	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
21	Synergen	5.1.3 (Page 40)	AP1	The registration functional area should be segmented to “banking”, “financial” and “technical” to provide for an operational segmentation of roles within participants.	This is a change to functionality of the MO systems. It shall be passed to the PRC for consideration.	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
22	Airtricity	Page 17	AP1	The table on page 17, while very useful, seems in some instances duplicative and inaccurate. There is no reason why the first item with respect to ‘Supplier Unit’ is repeated in the second item. Equally ‘Generator Unit (Distribution Connected, non-Autonomous)’ which is listed twice (items 4 & 6) possibly refers to two different Unit types. Presumably item 6 refers to ‘Generator Unit (Distribution	The table will be corrected	The AP was amended
23						

#	Respondent	Ref.	AP	Comment	Response	Action
				Connected, Autonomous)’. Descriptive Overview It is ambiguous to say that “Interconnectors and their related Units have special treatment under the SEM that differs from that of other Generator Units or Supplier Units” (highlight mine); Interconnectors and their related Units are treated as Generator Units and hence by implication the relevant difference is in contrast to other Generator Unit types.	The text shall be changed to compare them to Generator Units only.	The AP was amended
24	Airtricity	2	AP2			
	Airtricity	4.3	AP2	Swimlane - Updates to Available Transfer Capacity Two boxes in the Interconnector Administrator lane refer to “Interconnector Unit Nominations and Modified Interconnector Unit Nominations swimlane”. This is obviously a reference to swimlane 4.4 – Modified Interconnector Unit Nominations. There is a label mismatch here and is potentially misleading.	Swimlane shall be amended to refer to Modified Interconnector Unit Nominations swimlane	The AP was amended
25	Synergen	2.1.1	AP3	How are “Functional Areas” defined – please provide a definitive list	Functional Areas are defined in AP1	No action was taken
26						

#	Respondent	Ref.	AP	Comment	Response	Action
27	Airtricity	2.1.1.5	AP3	Guidelines Governing Digital Certificate Use What is the rationale for requiring a different Participant User identifier when qualifying for a new Communication Channel? Surely for a given Participant User the same single Digital Certificate is used irrespective of the Communication Channel used. Ditto access to same areas and functions for a given Participant User is irrespective of the Communication Channel being used. Why then the requirement for different identifiers?	This is because a login for a Type 3 Communication Channel is normally associated with a server whilst the login for a Type 2 Communication Channel is normally for a member of a Participant's staff.	The AP was amended
28	Synergen	2.3	AP3	Section 2.3 states "MO verifies that the participant has demonstrated compliance through self certification set out in AP 5 sections 3.2 and 3.3". AP 5 section 3.2 is comprised of abbreviations, whilst 3.3 does not exist.	This should be section 2.2 and 2.3 of AP5	The AP was amended
29	Airtricity	3.3	AP3	3.3 Digital Certificate Cancellation (Swimlane) No "Yes" identifier for the "Valid Request?" decision box.	The AP should be amended in line with the comment	The AP was amended
30	Airtricity	3.4	AP3	Ditto above for "Requirement for suspension." Also no "No" for "Is suspension required immediately?"	The AP should be amended in line with the comment	The AP was amended
31	Airtricity	4.4.8	AP3	Communication Channel Suspension (Procedural Steps) First sentence is incomplete; either "to undergo..." or "to re-qualify under..." Communication Channel... Second sentence, "id" should either be "is" or completely omitted.	The AP should be amended in line with the comment	The AP was amended

#	Respondent	Ref.	AP	Comment	Response	Action
32	Synergen	Table of Contents	AP3	The table of content is incorrectly formatted.	This will be amended	The AP was amended
	ESB	APP 2 - Generator Offer Data, Load Bid Data, Interconnector Offer Data, Settlement Reallocation Data	AP4	Most of the comments do not make any sense – they appear to be a merged set of expected results form validation tests? These comments need to be completely revised.	This issue will be passed to the PRC for consideration	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
33	ESB	App 2 – Unit (Resource Data)	AP4	(a) Definition of “Minimum Time Sync Warm” and “Minimum Time Sync Hot” appear incorrect. (b) “Number of Hours elapsed for Cold Sync time” – comment states that this is not utilised in the systems and can be left as Null in the Data Transaction – however the data is mandatory. (c) Definition of “Soak Times” appears to be different from that used in the Trading and Settlement Code. Soak Times refer to holding times during unit startups.	This issue will be passed to the PRC for consideration	Query was passed to the PRC / Mods Committee / Market Trial Working Group.

#	Respondent	Ref.	AP	Comment	Response	Action
	ESB	App 2 – Unit (Resource Data)	AP4	<p>In AP4, the definition of “Soak Time Hot 1” comment states “Time below Minimum Stable Generation for which a Unit remains at a constant MW level whilst in a hot state before continuing to increase or decrease output”</p> <p>In Trading and Settlement Code , Soak Time Hot is defined as “Means for each Soak Time Trigger Hot, Soak Time Hot must remain at that Soak Time Trigger Point Hot during a Hot Start”</p> <p>(d) “Target Reservoir Level Percentage” appears in Unit (Resource) table but also appears in Generator Offer Data table. Surely this should only appear in Generator Offer table?</p> <p>(e) “Target Reservoir Level MWH” appears in Unit (Resource) table but also appears in Generator Offer Data table. Surely this should only appear in Generator Offer table?</p>	This issue will be passed to the PRC for consideration	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
35	ESB	Appendix 2	AP4	<p>There is a general inconsistent use of terminology. Definitions used for terms in AP4 appear to be different from those used in the Trading and Settlement code. These should be aligned.</p> <p>Most fields in the Unit Data are marked as Mandatory even though they are not relevant for all unit types. For example Minimum Reservoir Capacity is ‘Mandatory’ but only Pump Storage units</p>	This issue will be passed to the PRC for consideration	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
36						

#	Respondent	Ref.	AP	Comment	Response	Action
				should be populating this field.		
	Synergen	Bank Data (Page 9)	AP4	The bank data updates must be supported via a fax signed by two Company Directors in advance of the change being made in the MPI system else the change should be rejected.	This is a change to the MO business process and so will be passed on to the PRC for consideration.	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
37	ESB	General	AP4	ESB intends updating the Unit Resource Data file on a Trading Day basis sometime prior to 10 am on Trading Day – 1. This file should be used for the Trading Day it refers to. What happens if a Generator submits a new Unit Resource file every day for units which contain a Priority Dispatch flag or other data such as Resource Type, Resource Name etc? – what is effect of clauses (e) and (f)? For Units Under Test it is usual that plans can change during testing – the suggested timelines for changing Start and End dates is effectively going to remove capacity from the system when it could be available. These times need to be made shorter and much more flexible. See clause (c) and (d) above. Many of the	1. Priority Dispatch timelines and Generator Unit Under Test timeline restrictions are set out in the Code. The Generator Unit under Test timelines need alignment with the Code. 2. All elements of the Unit Resource data not specifically mentioned in Table 2 become effective the next Trading Day after Gate Closure. The issue regarding the regular submission of this data will be passed to the PRC for consideration	1. The AP was amended. 2. Query was passed to the PRC / Mods Committee / Market Trial Working Group.
38						

#	Respondent	Ref.	AP	Comment	Response	Action
				changes will require design modifications for our systems if they remain.		
	Airtricity	Page 9	AP4	MI – Interconnector Offer Data Timeline refers to Standing Offer Data. It is our understanding of the Code that Standing Offer Data does not apply to Interconnector Units.	1. This will be removed from the AP as Standing Offer Data is not applicable to Interconnector Units 2. Change to “Anytime. Data returned...”	The AP was amended
39				Data Query – MPR “Anytime, data returned...”		

#	Respondent	Ref.	AP	Comment	Response	Action
	ESB	Section 2.2 (Page 8, 9)	AP4	Following on from completion of System training facilitated by the Market Operator it appears that access to update bank details is given to any user who can submit updates over the MPR. It has been indicated by SEMIT that a manual approval process will be in place before any such updates to banking data will be accepted. Given the important nature of this information, the exact manual approval process should be included in this Agreed Procedure and should contain, at a minimum, a written confirmation from a pre-agreed list of approved signatories that the change can take place.	This issue will be passed to the PRC for consideration	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
40	ESB	Section 2.2 (Page 8, 9)	AP4	Following on from completion of System training facilitated by the Market Operator it appears that only the last transaction submitted can be queried. For example, if a unit submits bids for Saturday, Sunday and Monday, only the Monday bid can be subsequently queried. When a bid is then submitted for Tuesday the Monday bid can no longer be queried. This is neither in line with our expectation or our understanding of the requirements of the code and this AP.	This issue will be passed to the PRC for consideration	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
41						

#	Respondent	Ref.	AP	Comment	Response	Action
	ESB	Section 2.4 (Page 11)	AP4	Registration Default TOD – “Any future updates to this Registration Default TOD, must be provided by the Participants and approved by the Market Operator” What is the definition of this approval process? Where is this covered in the Trading and Settlement Code? What are consequences of Market Operator not approving this data?	The approval process is just the validation of the data, i.e. that it is in the correct format, etc. The PRC will be queried if there are further forms of validation	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
42	ESB	Section 2.4.3 (Page 14)	AP4	See clause: “It is not anticipated that Registration Default TOD will change on a regular basis and is considered similar to static data” This is not true for ESB units. The intention is to submit this data each Trading Day to allow for changes in unit characteristics which can change from day to day as units move between Warmth States (Hot, Warm and Cold) and also as Combined Cycle plant change modes (due to changes in availability of individual components) It should be possible to submit updates to Registration Default TOD up to Gate Closure for the next Trading Day. There appears to be some confusion in this section as to how this requirement of the Trading and Settlement Code is being delivered.	It is possible to amend the Registration Default TOD for the items described in the comment, and have it effective the next Trading Day. The restrictions detailed in Table 2 do not apply to the technical operational characteristics of machines. The comment that it is not expected that this type of data should be changed will be deleted.	No action was taken
43						

#	Respondent	Ref.	AP	Comment	Response	Action
	ESB	Standing Offers	AP4	<p>Following on from completion of System training facilitated by the Market Operator it appears that only one Standing offer Day type 'All' can exist in the MO system. To ensure functionality works, submission of this type of offer is restricted so you can only submit a Standing offer Day type 'All' with an effective date 30 days in the future.</p> <p>It also appears that a standing offer day type 'All' must submit 25 hours worth of availability, min output and min load data every time it is submitted</p> <p>These need to be confirmed by the MO and if true need to be reflected in AP4</p>	This issue will be passed to the PRC for consideration	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
44	ESB	Table 2 (Page 8)	AP4	<p>Statements (a) to (f) appear to contradict clause 4.3 of the Trading and Settlement Code V2.0 which states that: "A Participant shall submit Commercial Offer Data and Technical Offer Data for each Trading Day for each Generator Unit registered to that Participant as specified within this Code and in accordance with Appendix I "Offer Data". Any such submitted Commercial Offer Data and Technical Offer Data shall be submitted prior to Gate Closure for the Trading Day to which the data relates."</p> <p>It is not clear from this version of AP4 what happens when a generator submits a new set of Technical Offer Data at say 9:45 am of Trading Day D – 1. Is this data used for Trading Day D? What is the effect of clause (b)?</p>	The first line in Table 2 page 8 note that all elements of Unit Resource Data other than those specifically listed allow for the data to be accepted before Gate Closure with an effective date the next Trading Day. The remaining data items are not Technical Offer Data or Commercial Offer Data as defined in the Code. Therefore there is no contradiction with the Code.	No action was taken. The effect of clause (b) was passed to the PRC / Mods Committee / Market Trial Working Group.
45						

#	Respondent	Ref.	AP	Comment	Response	Action
46	Synergen	Table of Contents (Page 2)	AP4	This is incorrectly formatted within the PDF and requires adjustment.	This should be corrected	The AP was amended
47	Airtricity	2.1.4	AP5	Denial of Service It is not clear what constitutes a denial of service other than “activities that may be reasonably construed.....by the Market Operator”; the phrase “reasonably construed” is open to interpretation. It would be more helpful if the Market Operator could give some quantitative guidelines as to what it would ‘reasonably construe’ as being a denial of service. It goes further to state that the Market Operator is “entitled to take any action in relation to the Communication Channels necessary to remedy the situation, including.....the restriction of Type 3 access for the Participant in question’. The concern is that a Market Participant who inadvertently causes a ‘denial of service’ may not be given the opportunity to address the problem before losing Type 3 access.	It is extremely difficult to quantify the denial of service. Denial of service attacks may be unintentional but if this prevents other participants from using the system then they need to be stopped immediately. Where a participant expects to configure its system where this may potentially be considered a denial of service attack then it would be advisable to discuss this with the MO beforehand.	No action was taken
48	NIE	2.3.1	AP5	It would be better to refer to a published security standard such as BS7799 or ISO 17799	AP5 security guidelines are based on extracts from ISO 17799. At the moment the MO cannot commit to fully complying with ISO 17799	No action was taken at this time
49	NIE	2.3.2	AP5	It seems that no one person or role has overall responsibility for IT Security, which we believe will result in lack of focus on these issues, and probably gaps in security implementation.	It is inappropriate to commit any Party to the Code to an organisational structure through the APs. Therefore different roles were set aside for each function.	No action was taken at this time

#	Respondent	Ref.	AP	Comment	Response	Action
	Synergen	2.3.2	AP5	<p>This section should be amended as follows to ensure that there is separation of roles in line with best practise.</p> <p>The following roles will be designated to manage the security of the Market Operator's Isolated Market System and for the avoidance of doubt each role must be held by a different individual:</p> <ul style="list-style-type: none"> • A Quality role will set out specific responsibilities for quality and security audit, system maintenance, technical authoring, familiarisation training and the security incident report procedure; • A Technical Operations role will set out responsibilities for computer/network security and database security; • A Facilities role will set out responsibilities for building security; • A Personnel Officer role will set out responsibilities for the training of staff on security matters. 	<p>This has a potential impact on the MO organisation. It shall be passed to the PRC for consideration.</p>	<p>Query was passed to the PRC / Mods Committee / Market Trial Working Group.</p>

#	Respondent	Ref.	AP	Comment	Response	Action
	Synergen	2.3.9	AP5	<p>This clause should be amend as follows so that the security regime endures also applies equally to any contractor staff working at the MO. The monitoring of this requirement should be part of the SEM audit function.</p> <p>The terms of reference for all staff including contractors' staff involved in delivering services associated with the Market Operator's Isolated Market System will be required to "comply at all times with the Market Operator security requirements and procedures from time to time in force".</p> <p>All employees and contractors' staff will be obliged to maintain customer confidentiality and these confidentiality obligations shall endure for a minimum of five year such these employees and contractors' staff cease to be employed or contracted to the Market Operator.</p>	This has a potential impact on the MO organisation. It shall be passed to the PRC for consideration.	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
51	ESB CS		AP6	<ul style="list-style-type: none"> • Publication of Time to Remove period, CAPBg, CAPGg and ECP is not covered in this AP. Publication of these variables is essential for credit cover calculations for new participants at Go Live. 	CAPB (Credit Assesment Price) is already in AP6. ECP (Estimated Capacity Price) will be included. CAPG is no longer used.	The AP was amended
52	ESB	2.1.1 Page 5	AP6	References to Appendix K of the Code for data publication should be to Appendix E based on TSC v2.0	This will be corrected	The AP was amended
53						

#	Respondent	Ref.	AP	Comment	Response	Action
	Synergen	2.4 (Page 6)	AP6	<p>The last paragraph of this section:</p> <p><i>“The Market Operator shall not be obliged to publish any material that it reasonably believes may be of an obscene or libellous nature.”</i></p> <p>repeats clause 2.343 of the T&SC V2.0</p> <p><i>“The Market Operator shall not be obliged to publish any material that it reasonably believes may be of an obscene or libellous or similar nature.”</i></p> <p>and therefore shouldn't be included here.</p>	Agree it could be removed. However it is not inconsistent and there are other elements in the AP which repeat the Code.	No action at this time
54	NIE	3.0	AP6	Does not make reference to the SMO website or data itmes that will be published through this mechanism - there are a number of reports that will be provided through a web web delivery mechanism (reference commnets made by the SMO at PMG meetings).	The MO Website will be the mechanism that the MO to fulfill its obligation to publish (to the general public) information and reports. All reports specified in Appendix K of the Code will be published through this mechanism. These reports and information may also be available to Participants through their Type 2 and Type 3 interfaces.	No action was taken
55	NIE	3.0	AP6	No reference to data files that are specified in the decision paper AIP/SEM/07/120 - commercially Sensitive Data under SEM (especially section 2.4 - Publication of Information for Validation of PES Wholes calculated volumes)	A CR has been raised to facilitate this decision but as stated in the decision paper the implementation of this CR is subject to resource constraints in the SEMIT implementation.	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
56						

#	Respondent	Ref.	AP	Comment	Response	Action
	ESB	3.7.2 Page 11	AP6	The example of file naming conventions is confusing as it uses the Participant Summary Report (PSR) which been removed from the MPUD. Also the example naming convention is unclear as it does not indicate the version of re-run reports (e.g. F1, F2, F3 etc.). It is not clear why naming conventions need to be covered in AP6 anyway as the information is in the MPUD.	<p>1. The example has been changed to a report that still exists. The information is kept in the AP.</p> <p>2. 6.2.1 of the MPUD specifies that "F" is used for all reports. Should this be Fn? This does not align with the naming convention in the AP. Moreover, the naming convention for the reports on the SMO website has not been described.</p>	<p>1. The AP was amended</p> <p>2. Query was passed to the PRC / Mods Committee / Market Trial Working Group.</p>
57	Synergen	4.1 (Page 14)	AP6	<p>AP6 defines public data as that required to be published by the Code, and private data as "individual reports generated for certain Participants only (or all of them) made available by the MO via the MPI". These definitions seem to restrict the MO from making any information publicly available that has not been specified in the Code – even if the information is not Participant specific, or commercially confidential. Synergen would prefer an approach whereby specific data items are deemed to be Private, and "private" means participant specific. In principle, if data can be made available to participants, it should also be made available more widely.</p> <p>"Initial ex-post capacity weighting factor" on page 25 is an example of data which is deemed "private" solely as it has not been specified to be published.</p>	The wording has been loosened to allow Public Data reports to contain more information than that specified in Appendix E of the Code, and to state that Confidential Information is only made available through single-Participant Private reports.	The AP was amended

#	Respondent	Ref.	AP	Comment	Response	Action
	Synergen	5.2 (Page 23-26)	AP6	<p>Appendix E of the Code sets out the data publication requirements. Synergen does not believe that AP06 is fully consistent with the Code.</p> <p>One example of this would be the publication of the CPM related data set out in Table E.7 of Appendix E, which sets out the data to be published. This data is not specified in AP6, and should be.</p> <p>AP6 cannot be a description of what the MO systems are presently specified to do, it must be a detailed description of how the Code is operated.</p> <p>Synergen believes that there needs to be a further consistency check to ensure that all data which is specified to be published in the Code is identified as being published on the MO website.</p>	There is a full review being performed of the consistency between AP6 and Appendix E of the Code.	The AP was amended
59	ESB	App2 Page 16	AP6	TOD, COD, Generator Unit Technical Characteristics, Energy Limited Technical Characteristics are stated to be publicly available and on the MPI but are not currently defined in the MPUD. We would want to automate capture of these via the MPI and need formats to be defined in the next MPUD.	Outstanding question for SEMIT: are these going to be available over the MPI, or are they only available member private over the query process?	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
60						

#	Respondent	Ref.	AP	Comment	Response	Action
	NIE	Appendix 2	AP6	Capacity Invoice report requires specification We assume that the "Indicative Ex-Post Capacity Payments Weighting factor" is in fact the Capacity invoice issued to each Supply Company - and that the "Ex-post initial energy payments to gen units" etc are the invoices to be issued to gen. Please confirm	The detail of Invoices is contained within AP15.	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
61	VPE	General	AP6	1) There remains inconsistencies between MPUD v3, T&SC 1.3 and current AP6. This is having a negative impact on the finalisation of business processes and (forecasting) systems. Main examples of these include, but are not limited to: -Publication time of Ex-ante Market Schedule -Publication of Technical Offer (TO) files.	A consistency between the Code (v2.0) and the AP is being performed	The AP was amended
62	VPE	General	AP6	2) We would prefer the following published via MPI as well as through the MO website -Maintenance Schedule Transaction - Generator Outage Schedule (Monthly) -Maintenance Schedule Transaction - Transmission Outage Schedule (Monthly) -Any Important Updates to Maintenance Schedule - Generator Outage Schedule (Daily) -Any Important Updates to Maintenance Schedule - Transmission Outage Schedule (Daily)	This cannot be done at this time. But this issue will be captured for consideration in "Day 2" changes to the Code.	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
63						

#	Respondent	Ref.	AP	Comment	Response	Action
64	VPE	General	AP6	3) Will there be a year-ahead Maintenance Schedule for Transmission and Generation? We understood that this was going to be made available earlier in the process. In current AP6 and the T&SC there is only a monthly and daily update.	This is in AP6 and in the Code	No action was taken
65	VPE	General	AP6	4) We need to confirm that when the following schedules are published they contain data for all generators: -Ex-Ante Market Schedule -Ex-Post Indicative Market Schedule -Ex-Post Initial Market Schedule The Ex-Ante Market Schedule should be published at D-1 13:00 and not as current set out in T&SC v1.3	1. As these schedules are being published they shall contain data for all dispatchable generators. 2. Ex-Ante Indicative Market Schedule is published on D+1 13:00. Only Market Prices are published D-1 13:00. This is in line with a previous market power decision paper in the availability of ex ante information.	No action was taken
66	VPE	General	AP6	5) The class on the following are incorrect and should be 'E': -Ex-ante Market Schedule Summary -Daily interconnector Capacity Active Holdings -Daily Interconnector Capacity Holdings -Interconnector User Capacity holding Data Transaction -Ex-Ante Indicative Market Prices	Will be amended to be Class E in the AP	The AP was amended
67	VPE	General	AP6	6) Given there is now no TO files being submitted by participants access is required to the TO data as submitted via registration to facilitate price forecasting and calibration. There is also an inconsistency here - see point 1) above.(VPE comments on AP6)	The Technical Offer Data report referred to in AP6 contains Technical Offer Data as defined in the Code. Some Technical Offer Data is submitted through MPR (Registration)	No action at this time

#	Respondent	Ref.	AP	Comment	Response	Action
68	VPE	General	AP6	7) What is contained in the following reports?: -Generator units Technical Characteristics Data Transactions -Energy Limited Generator Unit Technical Characteristics Data Transactions Do these reports provide what we require as set out in 6) above?(VPE comments on AP6)	The timing is detailed in the Code Appendix E and the detail of the contents are contained in Appendix K	No action at this time
69	VPE	General	AP6	8) The following data should be provided at D+1, and not only after the capacity period: -Indicative Eligible Availability -Initial Eligible Availability -Initial Ex-Post Loss of Load Probability	This is not calculated until the Capacity run is done at the end of the month and therefore is not available at D+1 at this time. This issue will be captured for consideration in "Day 2" changes to the Code	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
70	ESB	General	AP6	The publication time of the 'Ex- Ante Indicative Operations Schedule' which is the Day after Trading Day, by 16:00. This is a problem and complete contradiction as the name is 'Ex-Ante' and the time its published at is Ex-post. Please clarify.	The ex-ante Indicative Operations Schedule is not to be published until D+1 arising from a market power workstream decision. Other such ex-ante data that has ex post publication include Technical Offer Data, Commercial Offer Data, Interconnector Unit capacity holdings, Ex-ante Indicative Operations schedule, etc.	No action was taken
71	NIE	Pg 23	AP6	Note that this data file is only one of the four files that we are expecting to be produced as detailed in the paper - "Commercially Sensitive Data under SEM" AIP/SEM/07/120 - Initial Daily Jurisdiction Error Supply	A CR has been raised to facilitate this decision but as stated in the decision paper the implementation of this CR is subject to resource constraints in the SEMIT implementation.	No action was taken

#	Respondent	Ref.	AP	Comment	Response	Action
72	NIE	Pg 23	AP6	AP 6 page 23 it refers to the 2 Jurisdiction Error Supply reports as being produced at D+1 and D+5. The MPUD has these as D+1 and D+4, as do the test scripts	Jurisdictional Error reports have not been developed and shall be deleted from AP6 as they are not in Appendix E of Code	The AP was amended
73	Synergen		AP7	<p>The data listed at the point should also explicitly include the indicative market schedule on the day before trading which is very important for generators. Accordingly this step should be amended as follows:</p> <p>Complete part 1 of the Emergency Communication Form and notify impacted Parties of the General System Failure and list which of the following deadlines have been missed or are about to be missed:</p> <ul style="list-style-type: none"> • <u>calculation or publication of the indicative market schedule on the day before trading;</u> • calculation or publication of the System Marginal Price or any component thereof for any Trading Period; • Settlement of any Unit for any Billing Period; • calculation or publication of Capacity Payments or the issuance of a Settlement Statement for Capacity Payments and Capacity Charges for any Capacity Period. <p>Inform impacted Parties whether or not Administered Settlement has been invoked.</p> <p>Proceed from Step 3 and Step 6</p>	The Ex-Ante Indicative Market Schedule is not required to be published until D+1. The production of the ex ante market schedule is also important for Interconnector Trading. The requested change would require a change to the MO processes, and therefore was not made.	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
74	Synergen	(Page 9)	AP7	There is a formatting issue and this page is blank in the PDF	This should be corrected	The AP was amended

#	Respondent	Ref.	AP	Comment	Response	Action
75	Airtricity	7.2	AP7	This form is misaligned with some text hidden.	This will be amended (Conversion issue between word and pdf)	The AP was amended
76	Airtricity	7.3	AP7	This form is misaligned with some text hidden.	This will be amended (Conversion issue between word and pdf)	The AP was amended
77	Synergen	Appendix 2 (Page 22)	AP7	Various forms within the PDF aren't formatted correctly within the PDF.	This should be corrected	The AP was amended
78	Synergen	Appendix 2 (Page 22)	AP7	These forms contain a number of acronyms which could be confusing given the forms will be used infrequently. According, the acronyms should be replaced with complete descriptions.	Acronyms should be defined	The AP was amended

#	Respondent	Ref.	AP	Comment	Response	Action
	Synergen	Appendix 2 (Page 22)	AP7	<p>Various forms within AP07 require the sender to write their password on the form and fax / send it to the MO. This isn't secure as the password would be recorded on a form that is filed within the participant / MO as per 2.142 of the T&SC V2.0.</p> <p><i>"Each Party shall keep complete, accurate and up to date records whilst a Party to the Code and, where applicable, of its participation in the Pool for a minimum period of 3 years from the date of creation of such records."</i></p> <p>These processes require revision (if a secure confirmation of identity is required) as follows – the requirement for a password is replaced with a contact telephone number and the MO calls the sender to ask for two letters randomly selected from the password over the phone to preserve password integrity in line with standard password use.</p> <p>Alternatively the password requirement could be removed as it does not provide a secure additional confirmation of identity.</p>	This would be a significant change in business process and would impact many other APs in principle. This will be passed to the PRC for consideration.	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
79	ESB CS		AP9	The settlement timeline has been removed from the AP. The timeline was useful for illustrative purposes - is there a reason	The timeline only described a Billing period and not a capacity period. It was decided to remove	No action was taken
80						

#	Respondent	Ref.	AP	Comment	Response	Action
				that it has been removed?	to prevent any conflict of understanding	
81	ESB CS		AP9	When will the eligible credit cover providers list be published? When will the MO website be up and running with this information?	It is up to participants to identify eligible Credit Cover Providers. The MO will facilitate the process by publishing those Credit Cover Providers that it knows are eligible because participants have lodged LCs from them. The MO is not going to proactively review potential Credit Cover Providers.	No action was taken
82	ESB CS		AP9	Previous versions of the AP stated that the MO Credit Manager could use his expert judgement in deviating from the algorithmically calculated credit cover. This has not been included in this AP - can we take it therefore that the MO must strictly adhere to the rules of the code/AP?	The MO must always strictly adhere to the Code and APs. The Code and APs will describe any discretion that the MO may be given.	No action was taken
83	ESB CS		AP9	How likely is it that a credit cover provider will cease to be eligible to be a credit cover provider in the SEM - It could prove to be very costly to the participant to change credit cover providers as participants may have long standing relationships which would enable them to receive favourable rates for credit facilities? These favourable rates would not be available from other credit cover providers.	This is for the participants to assess.	No action was taken
84	ESB CS		AP9	Neither the T&SC v2.0 or AP 9 addresses the treatment of VAT in determining Required Credit Cover. This needs to be clarified and included in market	The VAT calculation for Required Credit Cover will be included in an Appendix in AP9	The AP was amended

#	Respondent	Ref.	AP	Comment	Response	Action
				documentation.		
	Airtricity	2.4	AP9	Provision of Credit Cover - The wording of the last sentence of this section is unclear; the intent is assumed to be that the MO will periodically review the list of Credit Cover Providers to ensure that they meet the Banking Eligibility Requirements.	The intent is correct. We shall reword to make it clear.	The AP was amended
85	Synergen	2.6 (Page 7)	AP9	This section requires amendment to correctly reflect the intent of SRAs as a generator must have no credit risk exposure to make an SRA: <i>"The Code allows Participants to lodge Settlement Reallocation Agreements, for the transference of Settlement obligation in the market from one Participant to the other. This also serves to reduce the Credit Risk, and hence Credit Cover requirements, of one Participant, and increase the Credit Risk of reduce the monies owed to the other. Participant Required Credit Cover calculations consider the impact of Settlement Reallocation Agreements. The detailed rules for Settlement Reallocation Agreements are set out in Agreed Procedure 10 "Settlement Reallocation"."</i>	Theoretically a generator could have a Required Credit Cover if its Accepted SRAs are greater than the forecast payments as calculated under the code. The Code explicitly determines the forecast method. Therefore the statement is correct. Agree that the SRA not only affect Credit Cover but also affect the monies owed but the suggested wording confuses the two elements.	No action was taken

#	Respondent	Ref.	AP	Comment	Response	Action
87	Airtricity	3.1.1	AP9	Overview Reference to Code missing	Reference to be removed	The AP was amended
88	Synergen	3.1.1 (Page 9)	AP9	The PDF has a referencing error as follows "Error! Reference source not found."	The reference should be removed.	The AP was amended
89	Synergen	3.2.2 (Page 9)	AP9	The 10 day period of grace within this section is too long and would lead to a significant period of exposure to generators – this should be reduced to 2 working days consistent with any other increase requirement as per 3.1.1.	This is consistent with the Code and any changes required should be progressed through the PRC.	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
90	Synergen	C4.8 (Page 17)	AP9	Amend this step to be 2 WD as per c2.7 on page 10.	The Code allows 10 WD for replacing a Credit Cover Provider if the old CCP becomes ineligible	No action was taken
91	Synergen	General (Page -)	AP9	It is not clear from the AP how the expiry of an LC will be treated. In order to protect SEM creditors, every LC should be called in full 5 working days prior to its expiry (unless it has been replaced / extended). The resultant cash can be placed on deposit as credit cover. This approach protects SEM creditors in the circumstances that a debtor in financial difficult lets its LC expire when it can't provide any alternatives.	This would require a change to the Code and is not considered a Critical change for go-live.	No action was taken
92	ESB	General Page 10	AP9	We would prefer if the window for posting revised credit cover was 3 days.	Following advice from the TSO Programme, the RAs understand that their original intention of one day was not possible, but that two days was possible. As the two days is a compromise the extra cost of a further one day's	No action was taken

#	Respondent	Ref.	AP	Comment	Response	Action
					exposure to the market will not be progressed by the RAs.	
93	NIE	Pg 10	AP9	C2.2 - clarification required of this statement as it appears to be inconsistent with that specified in the T&SC	This complies with code 6.177 as amended by section 7.	No action was taken
94	NIE	Pg 22	AP9	C5.10 - C5.13 - These steps imply that if a new LOC is provided for a different value that both LOC are active for a period of 2 WD. We do not believe that this should be the case, a new LOC should be used to replace the original one immediately. If this is not the case then effectively twice the level of required CC (or more) is in place for the stated duration.	The MO will only return an old LOC when it has confirmed the validity of the new LOC. (Note that the AP is going through an additional change as LC are now issued electronically between Banks)	The AP was amended
95	NIE	Pg 5 - 2.2	AP9	"...an other amounts" is not sufficiently well defined, please list other amounts in full	This generally refers to Settlement Reallocation Agreements and VAT. Text will be changed to make this specific	The AP was amended
96	NIE	Pg 6 - 2.4	AP9	Please clarify how the Credit Cover report is provided to Market Participants - is this a Channel 3 communication or fax	This is a channel 1 communication by Post/Fax as specified in the Procedural steps. It will be issued on the same day as the Initial Invoice for a Billing Period	No action was taken
97	NIE	Pg 6 - 2.4	AP9	The SMO should provide a daily calculation of credit cover for the month ahead by day to help the Participant understand any potential exposure.	This cannot be done at this time. But this issue will be captured for consideration in "Day 2" changes to the Code.	Query was passed to the PRC / Mods Committee / Market Trial Working Group.

#	Respondent	Ref.	AP	Comment	Response	Action
	NIE	Pg 7 - 2.7	AP9	Need to specify how SRA are included in the CC calculation to reduce the level required (see comment form AP 10 regarding specification)	The Code details how SRAs are included in the calculation of Required Credit Cover. The AP does not repeat the calculations of Required Credit Cover that are set out in the code.	No action was taken
98	NIE	Pg 7 - 2.8	AP9	Need to clarify who identifies an Adjusted Participant and how this is done	The Participant has an obligation under the Code to do this and notifies the MO by submitting revised Forecast data. See 6.182 & 6.185 of the Code	No action was taken
99	Airtricity	2.1	AP10	Settlement Reallocation (Last bullet point on page 6) Regarding the issue of allowing a maximum of 6 Settlement Reallocation Agreements (SRAs) to be lodged by a (Debited) Participant per Trading Day in a Billing or Capacity Period, we wish to clarify that, as section 3.1.2 seems to read, that this limitation does not apply to the counterparty (Credited Participant) to the SRAs. Using an illustration this would imply that even if a Generator Participant reallocates all 6 SRAs allowed in a Trading Day against a single Supplier Participant such that it exhausts its maximum allocation, it does not preclude another Generator Participant from nominating its SRAs against the same Supplier Participant in the case above.	Yes – this limitation does not apply to the Supplier Participant	No action was taken
100	Synergen	2.1 (Page 6)	AP10	The requirement for a maximum of 6 SRAs is not a code requirement (T&SC V2.0 6.235 – 6.246) and a barrier to trade as it prevents a generator segmenting its portfolio across more than 6 suppliers and	This limit has been put in place to prevent overloading the MO systems with too many SRAs The limit is in fact 42 SRA for a Billing period (6 per day, 7 days in a	No action was taken
101						

#	Respondent	Ref.	AP	Comment	Response	Action
				should be removed.	Billing Period) and between 168 and 186 SRAs for a Capacity Period depending on the month.	
102	Airtricity	2.2	AP10	Settlement Reallocation Submission (Paragraph 3) Settlement Reallocation is allowed between Participants in different Jurisdictions. Please update this to reflect.	Amendment will be made to comply with Code	The AP was amended
103	Synergen	3.1.2 (Page 7)	AP10	The requirement for a maximum of 6 SRAs is not a code requirement (T&SC V2.0 6.235 – 6.246) and a barrier to trade as it prevents a generator segmenting its portfolio across more than 6 suppliers and should be removed.	This limit has been put in place to prevent overloading the MO systems with too many SRAs The limit is in fact 42 SRA for a Billing period (6 per day, 7 days in a Billing Period) and between 168 and 186 SRAs for a Capacity Period depending on the month.	No action was taken
104	ESB	3.1.3 Page 8	AP10	SR1.4 - Will a reason be provided with notification as to why the submission is invalid?	The response is the automated response via the MPI. Please see MPUD for examples of invalidity error response.	No action was taken
105	ESB	3.2.2 Page 10	AP10	The settlement Reallocation Agreement causes the debited participants required credit cover to exceed its posted Credit cover. Can it be clarified in what circumstances this might or could occur?	A generator may have required Credit cover if it submits SRA which exceed its expected payments as assessed under Code clause 6.230.	No action was taken
106	ESB	3.3.2.1 Page 11	AP10	Is it anticipated that all faxes form MO will come to 1 central location so that all issues re bids etc will come to one fax number or will a separate fax number be applicable to settlement reallocation issues?	A number of different contacts can be registered in the MPR, each with different fax numbers	No action was taken

#	Respondent	Ref.	AP	Comment	Response	Action
107	ESB	3.3.3 Page 11	AP10	Both participants must lodge the cancellation request. Will both parties be notified of cancellation being successfully processed?	Yes see procedural steps SR3.8	No action was taken
108	NIE	Pg 5 - 2.1	AP10	Clarification required of this section - A Supplier unit cannot be a Debited Party	A Participant may not request or enter into a Settlement Reallocation Agreement as a Debited Participant in respect of its Supplier Units. It may enter into a SRA as Credited participant in respect of its Supplier Units. This is consistent with the Code.	No action was taken
109	NIE	Pg 5 and Pg 6 - 2.4	AP10	How is the allocation of Settlement Reallocations included in the Credit Cover calculation, we would expect the AP to be updated to clearly state how the credit cover requirement would be reduced when an SRA has been established	The AP does not repeat the calculations of Required Credit Cover that are set out in the code. The Code details how SRAs are included in the calculation of Required Credit Cover.	No action was taken
110	NIE	Pg 6 - 2.1	AP10	Clarify last bullet to state that 6 Energy SRAs and 6 Capacity SRAs are permitted for each Trading Day	This limit has been put in place to prevent overloading the MO systems with too many SRAs	No action was taken
111	NIE	Pg 7 - 3.1.2	AP10	Clarify last bullet to state that 6 Energy SRAs and 6 Capacity SRAs are permitted for each Trading Day	This limit has been put in place to prevent overloading the MO systems with too many SRAs	No action was taken
112	ESB CS	2.1	AP11	• What are the details of the Help Desk and when / where will these be published, i.e. operating hours, telephone numbers, email address etc.	No further details are currently available. This will be passed to the PRC for consideration.	Query was passed to the PRC / Mods Committee / Market Trial

#	Respondent	Ref.	AP	Comment	Response	Action
						Working Group
113	ESB CS	2.1.1	AP11	<ul style="list-style-type: none"> • What are the exact timelines associated with help desk responses for each type of request – 1, 2, 3,4 and 5 	<p>The timelines for category 1 and category 2 are contained within AP13 and AP14 respectively. Timelines for responses are also provided but not for resolution of issues as this will be dependent on the issue.</p>	No action was taken
114	ESB CS	2.1.2	AP11	<ul style="list-style-type: none"> • What is the process for keeping a participant informed of progress on an incident/request when it is not possible to resolve it immediately? • There should be a contact list collated of all stakeholders (business and technical reps) • What is the escalation procedure for a participant if an incident/request remains unresolved? • The participant should be notified of incident/request log number to enable follow up. Will this be done and if so how will this be done? 	<p>1. If not answered within 1WD, then the Market Operator and querying individual set out a timeframe for the response. There is no proceduralised method of updating the querying party while the query is being resolved.</p> <p>2. The Market Operator will gather such contacts during the registration process. In Appendix 2 of AP1, a process is set out for maintaining lists of individuals authorised to fulfill certain roles.</p> <p>3. The querying individual may raise a Dispute.</p> <p>4. The provision of a log number identifier to facilitate follow up will be passed to the PRC for consideration.</p>	<p>1. No action was taken</p> <p>2. No action was taken</p> <p>3. No action was taken</p> <p>4. Query was passed to the PRC / Mods Committee / Market Trial Working Group</p>

#	Respondent	Ref.	AP	Comment	Response	Action
115	ESB CS	2.2.2.2	AP11	<ul style="list-style-type: none"> • There is no minimum notice for emergency releases which do not affect the interface with Parties, the text states “as soon as practical”. However, there should be a minimum and this needs to be clarified. • Notification should be via email as well as website. 	<p>1. Emergency releases may occur very quickly if they are bug fixes which prevent running of critical parts of the market systems. All such emergency release will not affect the participants or their operation.</p> <p>2. The notification by email will be passed to the PRC for consideration</p>	<p>1. No action was taken</p> <p>2. Query was passed to the PRC / Mods Committee / Market Trial Working Group</p>
116	NIE	2.2.3	AP11	Testing - there may be additional detail elsewhere, but we believe it would be better to allow more time for involvement of the interested parties, for testing, and for signoff, before implementing changes to such a critical system.	Responsibility for testing MO systems is solely the Market Operator - there is no sign off required by Participants except that exercised through the Modifications Committee. This section does oblige the Market Operator to provide "Test" environments of the relevant MO systems where there is a change to the MO-Participant interface to allow the Participants to test changes to their systems	No action at this time
117	ESB CS	2.2.4.2 – 2.2.4.5	AP11	• It would appear that Level 1 – Level 3 changes do not require changes to the corresponding Participants Isolated Market Systems? If this is the case then this needs to be clearly stated.	This will be explicitly added to the descriptions of Level 1 to Level 3 inclusive.	The AP was amended
118	Synergen	2.2.4.4	AP11	Given “The Level 3 Implementations will follow a similar process as Level 2 Implementations” for clarity please explain the differences in the envisaged approach.	No difference in the approach although Participant may wish to make additional contingency arrangements for Level 3 implementations as these may have a greater affect on their day to day operation	No action was taken

#	Respondent	Ref.	AP	Comment	Response	Action
119	Synergen	2.3.3	AP11	The precise measurement of this availability needs clarity – on the basis that scheduled downtime is excluded from the availability measure the target system availability is currently set too low – this should be 99.9% consistent with international best practise.	This will be passed to the PRC for consideration	Query was passed to the PRC / Mods Committee / Market Trial Working Group
120	ESB CS	2.3.4	AP11	• Where and when will the contingency arrangements be published?	AP7 is part of the contingency arrangements; the SOs, IAs, and MDPs are required to have disaster recovery in place. They are not required to publish these under the Code.	No action was taken
121	ESB CS	2.4.1	AP11	• “When an incident has, which in the opinion of the Market Operator, has had an effect on Market Prices”, how does the Market Operator come to this conclusion and how is this determined? What is the process involved and where is this detailed?	Market Operator determines this examining if the inputs to the MSP Software or operation of the MSP Software has been affected.	No action was taken
122	ESB CS	2.4.2	AP11	• Where will this report be published and will it be available to Market Participants?	The Code does not require this publication, and therefore the AP will not place further publication obligations on the Market Operator	No action was taken
123	Synergen	3.2.1	AP11	Change management is described as software related but this may not always be the case. Change management should apply to new hardware, moving servers, new telecoms configurations (basically infrastructure) etc. This comment also applies to section 4.2.1 step 2.	This will be passed to the PRC for consideration	Query was passed to the PRC / Mods Committee / Market Trial Working Group

#	Respondent	Ref.	AP	Comment	Response	Action
124	Synergen	4.3	AP11	This section relates to Problem Management. There is no definition of a “problem”, and Synergen believes that one should be set out.	Problem is only a title. The section details how to implement interim solutions for a Failure.	No action was taken
125	Synergen	Appendix 2	AP11	<p>Various forms within AP11 require the sender to write their password on the form and fax / send it to the MO. This isn't secure as the password would be recorded on a form that is filed within the participant as per 2.100 of the T&SC V1.3.</p> <p>“Each Party shall keep complete, accurate and up to date records whilst a Party to the Code and, where applicable, of its participation in the Pool for a minimum period of 3 years from the date of creation of such records.”</p> <p>These processes require revision as follows – the requirement for a password is replaced with a contact telephone number and the MO calls the sender to ask for two letters randomly selected from the password over the phone to preserve password integrity in line with standard password use.</p>	This method is used in other markets (e.g. BETTA). The suggested method is a significant increase in administration and would require the sender to be available at all times to receive the phone call.	No action was taken
126	Synergen	Appendix 4	AP11	<p>The segmentation of authorisation categories as below is insufficient.</p> <p>Category Description Agreed Procedure A Change Authorisations AP11 B Submit Data Queries or Settlement Queries AP13 C Submit Settlement Disputes AP14 D Submit Commercial Offer Data &</p>	This will be passed to the PRC for consideration	Query was passed to the PRC / Mods Committee / Market Trial Working Group

#	Respondent	Ref.	AP	Comment	Response	Action
				<p>Technical Offer Data AP4, AP7 E Declare Limited Communication Failure Request/Agree Change in Communication Channel AP7, AP11 F Intermediary Authorisation AP1 G Ad-Hoc Report request H Submit/Modify Unit Registration and/or Interconnector Data AP1 I Request return of Collateral AP9 J Person to be notified in event of General System Failure and/or General Communication Failure AP7</p> <p>There should be a further category to split financial matters from technical registration data in "H" and "D" should be split into three separate classifications to allow a functional split of roles / authorisations within participant businesses.</p>		
127	Synergen	Appendix 4 Category A	AP11	<p>There are insufficient controls on the changing of banks arrangements. Any change to the banking details must be supported by a "Category A" fax and therefore the description of Category A should be amended to reflect the inclusion of manual authorisation of banking changes.</p> <p>"Change Authorisations & confirm banking changes"</p>	This will be passed to the PRC for consideration	Query was passed to the PRC / Mods Committee / Market Trial Working Group
128	Synergen	Appendix 4 Category D	AP11	The description of Category D should be amended to reflect the inclusion of SRAs as per the PRC clarification.	Will be included.	The AP was amended

#	Respondent	Ref.	AP	Comment	Response	Action
				"Submit SRA, Commercial Offer Data & Technical Offer Data"		
129	Synergen	Authorisation Amendment Form Part C	AP11	This form is inconsistent with the list in Appendix 4 of AP11 – please remove this internal inconsistency.	The list categories should indeed be consistent - the two lists of categories will be aligned.	The AP was amended
130	NIE	General	AP11	AP11 mentions failures and rectification but not how it will do it. What for example happens if type 3 communications fail at the SMO end so the participants use type 2 or type 1 for a while. How does the SMO then get all that data into their system so that it can then be reflected in type 3 communications when they are fixed.	AP7 deals with Communication Failures and the processes to be followed. Rectification of other failures of the MO systems which do not include interaction with Participants is the sole responsibility of the MO	No action was taken
131	ESB Networks	Help Desk	AP11	What are the hours in which the Help Desk will be available, or where are they defined.	This information is not currently available. This will be passed to the PRC for consideration	Query was passed to the PRC / Mods Committee / Market Trial Working Group
132	NIE	Pg 12	AP11	The AP text still states that user authentication involves sending username plus password in faxes, emails and letters and signature as well in letters and faxes. Not so secure, we have requested this to be changed on a number of previous occasions	This password is used for Type 1 Communication only and not for Type 2 or Type 3 Communications. The password is registered when that User is authorised for these functions (This is also a Type 1 Channel authorisation)	No action was taken

#	Respondent	Ref.	AP	Comment	Response	Action
133	ESB Networks	Release Management	AP11	<p>Any releases that impact the ROI Retail Market will need to be managed and co-ordinated through the RMDS.</p> <p>A process will need to be put in place to ensure this happens in a co-ordinated manner.</p>	The Level 4 implementation allows for the RMDS to coordinate changes with the wholesale market. If, under working practice, it is determined that this interaction is sufficiently predictable that proceduralisation is beneficial, this can be included in later versions of the AP through the Modification Committee.	No action was taken
134	NIE	General	AP11 and AP5	One general comment on the documents - they are at a very high level (probably by necessity) but the question about the next level of detail remains. Will such detail be produced and by whom, will it be consistent and agreed among the different parties, and will it be appropriate for the staff who have to operate them? We would have concerns that if the detail is not specified and clear procedures agreed, then it will lead to confusion and lack of ownership.	It is intentional that the security specifications are at a high level. It provides the framework for the MO to develop its own IT security policies as publicising them may jeopardise security	No action was taken
135	Synergen	2.1 (Page 6)	AP12	The first paragraph refers to "members" and the bullets to "Members". Defined term should be capitalised and consistent.	This should be amended	The AP was amended
136	Synergen	2.2 (Page 7)	AP12	<p>Typo – "summarizing" to be changed to "summarising". As this is a legal document in NI it should be spelt in English / English not US / English.</p> <p>(last bullet in the first set of bullets on page 7)</p>	This should be amended	The AP was amended

#	Respondent	Ref.	AP	Comment	Response	Action
137	Synergen	2.2 (Page 7)	AP12	<p>Regarding the minutes:</p> <p>There needs to be a process to define how formal minutes are agreed if there is a divergence of views. Synergen believes that it would not be appropriate for a functional secretariat to take such decisions. Thus, there needs to be a bullet points Synergen suggests :</p> <p>“In the event of a dispute regarding the form of the final minutes, a decision on the final wording will rest with the Chairperson”.</p>	The process is defined. The draft minutes and all comments / objections are included. The addition to the process of the chairperson casting will be passed to the PRC for consideration.	Query was raised with the PRC
138	Synergen	2.2 (Page 7)	AP12	Regarding the minutes – bullet 3 amend wording of bullet 3 to state “the Secretariat will include all these comments” i.e. add the requirement to include all views.	Agree this would make it clear	The AP was amended
139	Synergen	2.2 (Page 8)	AP12	Amend the wording in the penultimate paragraph to include a requirement to publish the quarterly report within two days.	Timetable for quarterly reports need to be agreed with the MO. This will be passed to the PRC for consideration.	Query was passed to the PRC / Mods Committee / Market Trial Working Group
140	Synergen	Headers and footers (Page 4)	AP12	Headers and footers are missing from the document on this page.	This should be amended	The AP was amended
141	ESB CS	Limited Liability	AP12	There has been no provision relating to limit the liability of participants on the code modification committee. Propose to include something like "No Member or individual in any Code Modification committee shall be liable (in whatever	This is outside the scope of this AP. But this issue will be captured for consideration in "Day 2" changes to the Code	Query was passed to the PRC / Mods Committee / Market Trial Working Group

#	Respondent	Ref.	AP	Comment	Response	Action
				capacity) and no employer of any such person shall be vicariously liable for any act or thing done or omitted to be done pursuant to, in relation to, in respect of or in connection with these Rules."		
142	ESB CS	Members Appointment	AP12	The appointment of members and chairman to the modification committee have not been clear. Will each market participant be represented in the Mods committee at the start of the new SEM, or there will be representative for each category of participant, i.e. 1 rep for PES, 1 rep for AER, etc	The initial nomination process is within Section 8 of the Code and is outside the scope of this AP. The RAs will determine the constitution of the Supplier Participant members.	No action at this time
143	ESB CS	Modifications Committee Scope	AP12	Scope of modification proposal should be clearly spelled out. The T&SC made references to the grid code, metering code, connection agreements. Is it expected that the Code modification committee will also look into the proposed changes in these documents?	The Modifications Committee will only look at changes to the Code. Where there is consequential or initiating changes from other industry documentation then these changes will need to be coordinated with the appropriate groups.	No action was taken
144	ESB CS	Nomination of Participant Members	AP12	While it is clear as to the duration of the term of the chairperson being limited to one year the AP and the T&SC v2.0 does not state the term of appointment of participant members. In the Code it states that initial members appointed by the RAs will be for 2 years, however there is no clarity on the duration of the term for elected members. The code current states that nominations occur "for appointment to the Modifications Committee at such time as the then existing Modifications Committee may notify". This suggest that membership is ongoing and may cause	This is outside the scope of this AP. But this issue will be captured for consideration in "Day 2" changes to the Code	Query was passed to the PRC / Mods Committee / Market Trial Working Group

#	Respondent	Ref.	AP	Comment	Response	Action
				difficulties if some participants lack adequate representation on the initial panel.		
145	Synergen	Table of contents (Page 2)	AP12	The table of contents isn't correctly formatted as 3.5 says "ERROR! BOOKMARK NOT DEFINED".	This should be amended	The AP was amended
146	ESB CS	View of Authority	AP12	There should be provision to include the view of the Authority such as "At any stage prior to the date on which the Committee Secretary finalises the Modification Report, the Code Modification Committee may decide to seek a view from the Authority on any matter arising (under these Rules or otherwise) from a Modification Proposal."	The RAs are (non-voting) members of the Modification and can therefore enter into a discussion during the debate of Modifications Proposal.	No action was taken
147	ESB CS	2.1.1	AP13	It is suggested that Data Queries & Settlement Queries should be submitted by fax/registered overnight mail (see also Procedural Steps 3.1 Data Query & 3.2 Settlement Query ~ pages 10 & 14). The current established norm (existing market) is for such queries to be submitted by email. It is easier and quicker to submit via email. It may be necessary, for legal reasons, for the submission of Disputes by fax/overnight mail, however Data Queries & Settlement Queries are just queries and should be on the most part resolvable without going to the dispute stage. Submission of Data and Settlement queries via email would also readily allow for the copying of such queries to the	There is no provision for the use of only email in any formal communication in the SEM for the initial 12 months. The official form of any submission must be supported with fax/registered mail. This does not prevent Participants from submitting the Data Query, Settlement Query or Dispute by email, but this would be additional to the formal route.	No action was taken

#	Respondent	Ref.	AP	Comment	Response	Action
				Regulatory Authorities. At a minimum, it should be permissible to submit a dispute via email and then forward same dispute to the Market Operator via fax/registered overnight mail.		
148	ESB CS	2.1.3 / 2.2.3	AP13	How will the Market Operator communicate the materiality determinations and changes to settlement items to the affected Market Participants - will it be through fax and contain affected settlement day and query ref?	It will be through Fax/overnight mail. There shall be sufficient information for the Participant to identify the original Query.	No action was taken
149	VPE	2.1.4 / 2.2.4	AP13	Section 2.1.4 last paragraph and Section 2.2.4 Corrective Actions last paragraph The time under which a settlement dispute can be raised should be increased from 5 working days to 10 working days.	Code (2.284) requires this to be 5 working days.	No action was taken
150	ESB	2.1.4.	AP13	Please clarify what Settlement recalculation threshold is or where we can get this information.	Settlement Recalculation Threshold is defined in the Code (see 6.77). It will be included in the Defined terms in Appendix 1 of the AP [when is this published]	No action was taken
151	ESB CS	2.1.4.1	AP13	If SMP, MSQ or Ex-post loss of load probability will be recalculated will this be a dedicated rerun for all Market Participants or part of the timetabled settlement rerun?	Where SMP, MSQs or LOLP is required to be recalculated then the recalculated values will be used in the next Settlement Run for that day. This may be an ad-hoc Settlement Rerun or a Timetabled Settlement Rerun depending on the Materiality of the resolved Data Query, Settlement Query or Dispute. The timing of the recalculation may be at anytime after the resolution and prior to the Settlement Rerun.	No action was taken

#	Respondent	Ref.	AP	Comment	Response	Action
152	ESB CS	2.2.4.1	AP13	The result of that Settlement Rerun will be applied to all Participants. Will the same occur for Data Queries?	Where a Data Query results in a change of data then it will be applied in the designated Settlement Rerun (ad-hoc or Timetabled). The results of the Settlement Rerun shall be applied to all Participants.	No action was taken
153	ESB CS	3.1	AP13	Regulatory Authority should be copies on all Data and Settlement Queries so that the operation of the Market can be monitored and also the performance of the Market Operator in relation to such queries. The submission of these queries via email would readily allow for the submission of said queries to both the Market Operator and the Regulatory	The RAs do not need to get involved in the day to day running of the market. The RAs has powers to requesting performance information form the MO to monitor the workings of the market. It is within the gift of the Participant to copy the RAs when submitting a Data or Settlement Query but there is no formal role for the RA in resolving the Query.	No action was taken
154	ESB CS	3.1	AP13	Why is it necessary for the Market Operator to request an extra 10 days to assist in the resolution of Data & Settlement Queries. This appears to make the process more cumbersome and intensive. Why not have this 10 days built into the query resolution process as standard, and if the Market Operator can resolve the query ahead of schedule, well and good. If not the query escalates to dispute status. There should be a lot less time spent messing around requesting extra time	Data Query is now being amended to have a 10 day window in a similar timescales as Settlement Queries. This is included in version 2 of the Code and the AP will be amended to be cosnsistent.	The AP was amended

#	Respondent	Ref.	AP	Comment	Response	Action
155	Airtricity	3.1	AP13	Procedural steps 6, 7 and 8 are labelled "[Intentionally blank]." It is not clear at this late stage why such gaps are still allowed in the Market documents. The underlying logic for leaving them blank should at least be spelt out in the steps, even if the legal wording has not been fully formed.	These will be removed and the steps renumbered	The AP was amended
156	ESB	3.1 - Step 1	AP13	Indicating further 10 WD for resolution is granted, refer back to section 2.1.2. Should the 10 days be provided in the raised query or should it only be granted on request from the MO? How should this be decided and are there any rules to apply?	The Code has now changed. The MO has 10 days to resolve the Data Query unless an extension is agreed with the Participant.	The AP was amended
157	ESB	3.1 - Step 12	AP13	Should by/from read as MO and the to field read as raising party?	By/From should be Affected Participant and To should be Market Operator. This is the Affected Participant stating the query cannot be responded to the query in the designated timescales. The MO then has to decide if he can resolve the query with no input from the Affected Participant	The AP was amended
158	Airtricity	3.2	AP13	Procedural steps 6, 7 and 8 are labelled "[Intentionally blank]." It is not clear at this late stage why such gaps are still allowed in the Market documents. The underlying logic for leaving them blank should at least be spelt out in the steps, even if the legal wording has not been fully formed.	These will be removed and the steps renumbered	The AP was amended

#	Respondent	Ref.	AP	Comment	Response	Action
159	ESB	3.2 - Step 1	AP13	Please clarify timing. Is it 5 WD before end of 13 month resettlement period?	It is 5 WD after the Last Timetabled Settlement Rerun. This is intended to give the Participants an opportunity to raise a Settlement Query against the final Invoice for a Capacity or Billing Period so it must be after they have received the Invoice.	No action was taken
160	ESB CS	5.1	AP13	Settlement Data Query Form should have the Market Operators contact details printed/displayed on the form as standard.	When details are known then this will be added to the form. This will be passed to the PRC for consideration	Query was passed to the PRC / Mods Committee / Market Trial Working Group
161	Synergen	5.1 (Page 21 onwards)	AP13	The forms within the PDF are unreadable.	This should be amended	The AP was amended
162	Synergen	5.1 (Page 21 onwards)	AP13	<p>Various forms within AP13 require the sender to write their password on the form and fax / send it to the MO. This isn't secure as the password would be recorded on a form that is filed within the participant / MO as per 2.142 of the T&SC V2.0.</p> <p>"Each Party shall keep complete, accurate and up to date records whilst a Party to the Code and, where applicable, of its participation in the Pool for a minimum period of 3 years from the date of creation of such records."</p> <p>These processes require revision (if a secure confirmation of identity is required)</p>	This would be a significant change in business process and would impact many other APs in principle. This will be passed to the PRC for consideration.	Query was passed to the PRC / Mods Committee / Market Trial Working Group

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				<p>as follows – the requirement for a password is replaced with a contact telephone number and the MO calls the sender to ask for two letters randomly selected from the password over the phone to preserve password integrity in line with standard password use.</p> <p>Alternatively the password requirement could be removed as it does not provide a secure additional confirmation of identity.</p>		
163	ESB CS	Appendix 2	AP13	Could clearer forms be provided as some of the information is not coming through on the pdfs	These will be corrected. (This was conversion issue from word to pdf)	The AP was amended
164	Airtricity	Appendix 2	AP13	All the forms in this appendix are misaligned and some text half-printed	These will be corrected. (This was conversion issue from word to pdf)	The AP was amended
165	Airtricity	Appendix 3	AP13	The terms “Item” and “Validation” are headings for all the text following after them. They should be identified as such by some font feature such as bolding or underlining them.	The Appendix will be reformatted to make it clear	The AP was amended
166	Airtricity	General	AP13	Is the validation of queries based on the time & date stamp of the sent mail (by registered overnight mail), or is it based on the time & date of receipt of the mail?	The Code states the following (2.359) in respect of deemed delivery of Notices 1. in the case of delivery by hand, when delivered; or 2. in the case of prepaid post, on the second Working Day following the day of posting or, if sent from another jurisdiction other than Northern Ireland or	No action was taken

#	Respondent	Ref.	AP	Comment	Response	Action
					Ireland, on the fifth Working Day following the day of posting; or 3. in the case of fax, at 5pm on the Working Day on which the Notice was sent as evidenced by a fax transmission report of the sending Party showing that the Notice has been transmitted;	
167	NIE		AP13 and AP14	General - When a Query or Dispute is raised by a Participant re their metered data the relevant PES who as the balance in the market should be informed, not necessarily of who raised the query but as to the likely impact on the PES's settlement. In summary any change to a 2TS demand will change that of the "host2 PES	This is covered in AP13 as the PES is an Affected Party and will be informed of the Query. In AP14 for Disputes the MO is required to identify other Parties affected by a dispute. The PES would be such an Affected Party.	No action was taken
168	ESB CS	2.1	AP14	It is suggested that Disputes should be submitted by fax/registered overnight mail. It would be preferable if disputes were submitted by email to the Market Operator and copied to the Regulatory Authority. The dispute should also be either faxed to the Market Operator or submitted to the Market Operator by overnight mail to ensure that the dispute is guaranteed delivery to the Market Operator. Submission of Disputes via email would readily allow for the copying of such documentation to the Regulatory Authorities.	The RAs do not need to get involved in the day to day running of the market unless it is a dispute between a Party and the Market Operator. The RAs has powers to requesting performance information from the MO to monitor the workings of the market. It is within the gift of the Party to copy the RAs when submitting a Dispute where the counterparty is not the MO.	No action was taken
169	ESB CS	2.1	AP14	Once a query has escalated to dispute status, the Regulatory Authority should be informed (whether the Market Operator is a counterparty to the dispute or not) so	The RAs do not need to get involved in the day to day running of the market unless it is a dispute between a Party and the	No action was taken

#	Respondent	Ref.	AP	Comment	Response	Action
				that the operation of the Market can be monitored and also the performance of the Market Operator in relation to such disputes can also be monitored. The submission of these disputes via email would readily allow for the submission of said disputes to both the Market Operator and the Regulatory Authority.	Market Operator. The RAs has powers to requesting performance information form the MO to monitor the workings of the market. It is within the gift of the Party to copy the RAs when submitting a Dispute where the counterparty is not the MO.	
170	ESB CS	2.1	AP14	The Dispute Notice Form / Referral Notice Form / Dispute Resolution Form should have the Market Operators contact details printed/displayed on the form as standard and also the contact details for the Regulatory Authority	When details are known then this will be added to the form. This will be passed to the PRC for consideration.	Query was passed to the PRC / Mods Committee / Market Trial Working Group
171	Airtricity	2.1	AP14	Raising a Dispute 1b. Under 'timing' – the issue identified here refers to both Settlement and Data Queries; however the timing relates to just the Settlement Query, ignoring Data Query.	The Timing will have Data Query added	The AP was amended
172	VPE	2.1	AP14	The time under which a settlement dispute can be raised should be increased from 5 working days to 10 working days.	Code (2.284) requires this to be 5 working days.	No action was taken
173	Synergen	2.1 step 1A (Page 5)	AP14	It isn't clear that the correct contact details (FAX / POST) would be available for allow the raising party to circulate this to "Dispute Counterparties" and Synergen recommends that the MO circulates these disputes.	As this is a change in process this will be passed to the PRC for consideration.	Query was passed to the PRC / Mods Committee / Market Trial Working Group
174	Airtricity	2.2	AP14	Dispute Resolution Board – Composition – Bilateral Disputes Procedure step 7 is misidentified as '77'.	Step will be renumbered	The AP was amended

#	Respondent	Ref.	AP	Comment	Response	Action
175	Synergen	2.4 step 2 (Page 12)	AP14	Surely the MO should act on the "DISPUTE RESOLUTION BOARD's behalf to circulate documents and therefore change "DRB" in the "From/By" column to "MO on behalf of the DRB"	The MO generally does not get involved in the Dispute resolution. It is informed that a Dispute is occurring and then when it is resolved and the resolution. The DRB may be a single person or a 3 person DRB and one of the CRB members (probably the chairperson) should take the lead.	No action was taken
176	NIE		AP15	There appears to be a contradiction with the general approach in AP15 with that stated in AP10. Cross jurisdictional SRAs are not permitted, but the Currency Adjustment implies that they are	The Code now allows Crossjurisdictional SRA s and AP10 will be amended	The AP was amended
177	NIE		AP15	General - there is a significant issue regarding the treated of VAT and how this is then represented on the invoices. We need this potentially crucial issue to be clarified and appropriate elements updated in the AP with a degree of urgency	The method and application of VAT is described in the AP.	The AP was amended
178	ESB	2.1.3.1 Page 7	AP15	We have asked repeatedly for a worked example of how a Currency Cost arises. We are concerned that exposures and costs are being created when there is no need for them and as market participants will ultimately bear the cost on a pro-rata basis ESB will be "suffering" more than most if costs are unnecessarily created.	Currency costs are described in Appendix 2 of AP15. The currency costs come about because of the difference in exchange rates between the trading day and when invoices are paid. They can be a cost or a benefit depending on the movement of the exchange rate and the net flow of monies between jurisdictions	Query was passed to the PRC / Mods Committee / Market Trial Working Group

#	Respondent	Ref.	AP	Comment	Response	Action
179	ESB CS	2.2	AP15	pg 8 - Trading Payments settlement statement contains Loss Adjusted Metered Generation and Actual Availability. MPUD only refers to Meter Generation in Table 11 – Settlements Reports – Variable Type Reference. Actual Availability is not referred to at all. Please advise/confirm which document is correct?	Metered Generation is provided not Loss Adjusted Metered Generation. The Code requires Actual Availability to be provided and so is included in the AP. Eligible Availability is not provided with the Energy Statement.	The AP was amended
180	ESB CS	2.2	AP15	Trading Charges settlement statement contains Loss Adjusted Metered Demand. MPUD only refers to Metered Demand in Table 11 – Settlements Reports – Variable Type Reference. Please advise/confirm which document is correct?	Metered Demand is provided and not Loss adjusted Metered Demand	The AP was amended
181	ESB CS	2.4	AP15	Data Query/Settlement Query - If a Data Query or Settlement Query raised by the participant(s) is found in favour of the participant(s) and found against the Market Operator, interest should be charged by (or be payable to) the participant(s) if a necessitated Settlement Rerun reveals that there was a shortfall in payment to the participant(s).	Rerun statements always include interest as part of their calculation as specified in the Code	No action was taken
182	ESB CS	2.5	AP15	Settlement Dispute - If a Settlement Dispute raised by the participant(s) is found in favour of the participant(s) and found against the Market Operator, interest should be charged by (or be payable to) the participant(s) if a necessitated Settlement Rerun reveals that there was a shortfall in payment to the participant(s).	This will be part of the resolution of the Settlement Dispute. If the Settlement Dispute is reconciled by Timetabled Settlement Rerun or an ad hoc Settlement rerun then the normal interest rules will automatically be used.	No action was taken

#	Respondent	Ref.	AP	Comment	Response	Action
183	ESB CS	3.2	AP15	Invoicing for Rerun Settlement Statements - A response to a query on settlement rerun through the PRC indicated that Settlement Rerun amount is not provided on the rerun invoice. Please advise/confirm which is correct?	The Rerun settlement statement should contain the Payments/Charges from the previous Settlement run and the current Settlement Run and the difference between them.	No action was taken
184	ESB CS	3.3	AP15	Payment Default - Recovery of Unsecured Bad Debt Charge • Whenever possible, interest should be recoverable on all monies owed to Reduced Participants should a Participant/Participants be in default.	Interest is recoverable for Unsecured Bad Debt and distributable to the Reduced Participants.	No action was taken
185	ESB	3.3 Page 12	AP15	Recovery of unsecured bad debt. Why do the self billing invoice payments need to wait for the next billing period if not electronic. Should they be repaid immediately on recovery. Otherwise there will be additional interest due? Timing on the turnaround here is tight for payments and receipts but this has already being raised and assumption no change entertained here. The other area of note here is that AP17 is related in as much as banking details are contained here is relation to clearing of billing and self billing invoices and from the point of view particularly of payments to MO this needs to be recognised in accepting details into our payments system i.e. there are 6 separate bank accounts in MO to deal with different forms of invoices and charge types received.	1. This is consistent with the Code. If a change is required then this should e raised for consideration in "Day 2" changes to the Code. 2. Agree	No action was taken

#	Respondent	Ref.	AP	Comment	Response	Action
186	Airtricity	6.2	AP15	Is the standard rate for VAT in Ireland 21%? Section 6.1 indicates that it is 13.5%. All communications previous indicate that 13.5% is the correct rate.	The standard VAT rate for goods is 13.5% (including electricity) and 21% for services (Market Operator Charges)	No action was taken
187	VPE	General	AP15	Currently invoices are to be sent in the post and via Type 2/3 channels. VP&E consider that invoices should also be faxed.	There is no current plan to fax the invoices. The issue will be passed to the PRC for consideration.	Query was passed to the PRC / Mods Committee / Market Trial Working Group
188	Synergen	General (Page -)	AP15	Paragraph 6.260 of T&SC V2.0 makes reference to a letter from the Revenue Authorities as follows: "The following paragraphs deal with the treatment of VAT for the purposes of the Code and are prepared subject to and in accordance with the terms of the joint letter from Her Majesty's Revenue and Customs and the Revenue Commissioners (together referred to as the "Revenue Authorities") entitled "Agreement with regard to VAT and the operation of the All-Island Electricity Market" (the "VAT Agreement")." This "VAT Agreement" should be included as an appendix to AP15 so that it captured within the contractual framework of the T&SC.	It is not necessary to include the detail of VAT requirements in the AP. If the VAT Agreement changes then the MO would be required to implement the revised VAT Agreement, i.e. the VAT agreement is not subject to the Mods Committee governance.	No action was taken
189	NIE	Pg 8 - 2.12 and 2.2	AP15	Please clarify the statement regarding the production of the Settlement Statement for Capacity described in 2.12 and 2.2. They indicate that there may be a single statement for the full period with daily values, or one statement for each day.	There will be separate statements for each day. This will be clarified in the AP	The AP was amended

#	Respondent	Ref.	AP	Comment	Response	Action
190	NIE	Pg 9	AP15	Add Currency Cost Adjustment (Reallocation) to glossary and define in the following text - item is shown as line item on invoice only	Description will be added in the AP. This relates to currency costs of cross-jurisdictional SRAs	The AP was amended
191	ESB Networks	5.1	AP16	Under the definition, is there the potential for Meter Data Providers to request the Market Operator that due to essential maintenance of IT systems of a Meter Data Provider, that a Bank Holiday would be agreed to be a non working day.	This potential does exist, but essentially it is to the discretion of the Market Operator as to which bank holidays are not defined as Week Days.	No action was taken
192	ESB Networks	6.2	AP16	The use of the words 'meter readings' is being queried.	This terms will be changes to meter data as appropriate	The AP was amended
193	ESB Networks	Availability of the Market Operator System	AP16	Is the Market Operator system available 7*24 to Meter Data Providers for the provision of data, or if not then what is the flexibility in terms of hours for the Ad Hoc, M+4 and M+13 data provision.	The Navita Interface is available 24*7 to Meter Data Providers, subject to scheduled down-times and its availability targets. The Meter Data needs to be received by the Market Operator by the timelines specified in the Code. It is to the Meter Data Provider discretion as to when the data is sent to the Market Operator within the month in question, noting that the earlier the file send, the greater the level of estimation of the data. The AP was amended to "within" M+4 and M+13	The AP was amended

#	Respondent	Ref.	AP	Comment	Response	Action
194	ESB Networks	Procedural Step 17	AP16	We do not believe that it is feasible to initiate a manual process if a transaction that was sent by a Meter Data Provider has not been received by the Market Operator before 2 seconds following submission , and request that a more realistic time could be suggested.	This will be changed to under suitable timeframes.	The AP was amended
195	ESB	2.2.1	AP17	How is it intended that the MO and the MO's bank will "agree" the rate of exchange? Is there to be a competitive or benchmarking process whereby the MO knows it is receiving competitive FX rates? There could be large costs associated with this for the market participants to bear.	It is not proposed at this time that the MO will contain a treasury function. Therefore the currency exchange rate will be that offered by the SEM Bank.	Query was passed to the PRC / Mods Committee / Market Trial Working Group
196	ESB CS	2.2.1	AP17	How is it intended that the MO and the MO's bank will "agree" the rate of exchange? Is there to be a competitive or benchmarking process whereby the MO knows it is receiving competitive FX rates? There could be significant costs associated with this for the market participants to bear.	It is not proposed at this time that the MO will contain a treasury function. Therefore the currency exchange rate will be that offered by the SEM Bank.	No action was taken.
197	VPE	2.2.1	AP17	This section defines the role of Danske bank regarding currency purchases and exchange rate disclosures these two distinct functions should be clearly separated. The existing wording suggests they are the same process the wording should reflect the separate functions below: A. The SEM bank will purchase Euro or Stg at an agreed rate of exchange. B. The SEM bank will provide the MO with the appropriate rate of exchange etc.....	Agree the separation of the two different functions into two different sentences.	The AP was amended

#	Respondent	Ref.	AP	Comment	Response	Action
				Please amend the wording as requested.		
198	ESB	2.3	AP17	What is the legal status of holding the accounts on trust? Who are the trustees?	The Market Operator is the trustee of all accounts held on trust.	No action was taken
199	ESB	2.3	AP17	Is a draft of the proposed Bank Mandate for collateral reserve accounts available for review? Has the "corporate website" referenced in 2.7 been established and is it operational?	1. The issue of the Bank Mandate will be passed to the PRC for consideration. 2. The Corporate Website should be titled the MO Website. This MO Website is currently under development.	1. Query was passed to the PRC / Mods Committee / Market Trial Working Group 2. The AP was amended
200	ESB CS	2.3	AP17	What is the legal status of holding the accounts on trust? Who are the trustees?	The Market Operator is the trustee of all accounts held on trust.	No action was taken
201	ESB CS	2.3	AP17	Is a draft of the proposed Bank Mandate for collateral reserve accounts available for review? Has the "corporate website" referenced in 2.7 been established and is it operational?	1. The issue of the Bank Mandate will be passed to the PRC for consideration. 2. The Corporate Website should be titled the MO Website. This MO Website is currently under development.	1. Query was passed to the PRC / Mods Committee / Market Trial Working Group 2. The AP was amended
202	ESB CS	2.3	AP17	Collateral accounts will be in the joint names of the relevant Participant and the MO. However the money in this account is owned 100% by the participant (not 50/50 as you would normally associate	Please note that the joint account concept has disappeared from Version 2.0 of the Code. The AP will be amended	The AP was amended

#	Respondent	Ref.	AP	Comment	Response	Action
				with a joint account). The MO only has a call on this account in the event of a shortfall. At all other times, the participant is the sole owner of this money.		
203	NIE	2.3	AP17	Does the trading account incorporate all elements of the energy invoice?	Yes	No action was taken
204	Synergen	2.3	AP17	Specific banks are named here – surely this should make reference to the “SEM Bank” as per Section 2.4.	The specific reference to a bank is appropriate detail for an Agreed Procedure.	No action was taken
205	ESB	2.4	AP17	Has there been an independent control and risk audit of National Irish Bank’s Business eBanking Application which is to process the billions of euros of payments?	There has been no such audit.	Query was passed to the PRC / Mods Committee / Market Trial Working Group
206	ESB CS	2.4	AP17	Has there been an independent control and risk audit of National Irish Bank’s Business eBanking Application?	The Regulatory Authorities are not planning any audit of NB or NIB e-banking facilities. The query will be passed to the PRC for consideration.	Query was passed to the PRC / Mods Committee / Market Trial Working Group
207	ESB CS	2.4	AP17	What is the interest rate proposed by NIB for the Collateral Accounts? Clause 2.4 – Will the market participants have access to the eBanking facility to view balances etc? When will this be available?	1. The interest rate on SEM Bank accounts will be that offered by the SEM Bank. 2. The e-banking facility will be passed to the PRC for consideration. It should be noted that the MO will be providing a weekly statement of a Participants Posted Credit Cover.	1. No action was taken. 2. Query was passed to the PRC / Mods Committee / Market Trial Working Group

#	Respondent	Ref.	AP	Comment	Response	Action
208	NIE	2.4	AP17	The time window for the SMO making payments to participants is small. What scope is there for errors in comms	There is no mitigation for errors in communications. Interest starts accruing on the money owed.	No action was taken
209	Synergen	2.4	AP17	This section should require a check to ensure that any bank account detail changes are made confirmed via fax signed by two Company Directors in advance of the change being made in the MPI system else the change should be rejected.	This will require a change in business process for the MO. It will be passed to the PRC for consideration.	Query was passed to the PRC / Mods Committee / Market Trial Working Group
210	Synergen	2.5	AP17	Specific banks are named here – surely this should make reference to the “SEM Bank” as per Section 2.4.	The specific reference to a bank is appropriate detail for an Agreed Procedure.	No action was taken
211	NIE	2.5.1	AP17	Section states - "To ensure payments are made on time, a BACS instruction needs to be presented on the invoice date" followed by the example "Invoice raised 12:00 Friday, BACS submitted Friday, presented 3 working days later to arrive before 12:00 Wednesday". NIE will actually be submitting the BACS instruction on Monday before 12:00 which will be presented 2 working days later to arrive before 12:00 Wednesday. This will guarantee payment on time and has been confirmed by our Bank.	All payments are by electronic methods. Timelines are for example only, and if providers can improve on those timelines this has no impact on the successful operation of the market. Slight redrafting is required to clarify.	The AP was amended
212	NIE	2.6	AP17	Where re-settlement requires repayment of funds to a supplier is a self billing invoice issued?	Yes	No action was taken

#	Respondent	Ref.	AP	Comment	Response	Action
213	ESB	2.7	AP17	How often will the MO provide bank statements to market participants on their monies in the cash collateral accounts?	The MO will provide a weekly statement of a Participants Posted Credit Cover. The issue of provision of bank statements will be passed to the PRC for consideration.	Query was passed to the PRC / Mods Committee / Market Trial Working Group
214	ESB CS	2.7	AP17	How often will the MO provide bank statements to market participants on their monies in the cash collateral accounts?	The MO will provide a weekly statement of a Participants Posted Credit Cover. The issue of provision of bank statements will be passed to the PRC for consideration.	Query was passed to the PRC / Mods Committee / Market Trial Working Group
215	ESB	2.7.2	AP17	ESB has repeatedly highlighted that we believe the current draft of the LC in the T&S code is not market standard. Two banks have advised ESB of this to date. Are CER and the MO going to insist on this form of LC and can we have a list of banks who have agreed to this form?	The terms of the Letter of Credit are part of the Code and therefore cannot change prior to go-Active. This concern will be passed to the PRC for consideration.	Query was passed to the PRC / Mods Committee / Market Trial Working Group
216	ESB CS	2.7.2	AP17	ESB has highlighted on an ongoing basis that we believe the current draft of the LC in the T&S code is not market standard. Two banks have advised ESB of this to date. If the RAs mandate this form of LC, we would appreciate a list of the banks who have agreed to this form.	The terms of the Letter of Credit are part of the Code and therefore cannot change prior to go-Active. This concern will be passed to the PRC for consideration.	Query was passed to the PRC / Mods Committee / Market Trial Working Group
217	Airtricity	2.7.3	AP17	Deposits to and from Collateral Reserve Accounts More detail is required on the exact mechanics for movements in and out of the Collateral Reserve Account by a Participant. Even though this is a joint account between the Participant and the Market Operator, the Participant has no operational control over the account,	1. The AP shall be amended as the Collateral account will not be joint account but an account held by the MO as trustee for the Participant. The process of adding and withdrawing cash from the account is covered in AP9.	1. The AP was amended 2. Query was passed to the PRC / Mods Committee / Market Trial Working Group

#	Respondent	Ref.	AP	Comment	Response	Action
				<p>hence the need fully specify how a Participant can, for instance, go about making withdrawals from the account. Like elsewhere in the document, agreed procedures with regard to forms to use, authorised signatories, what exact payment method will be used (same day, standard, CHAPS, BACS, etc.) and commitment to turnaround times, are needed.</p> <p>There is also a need to specify the order in which Credit Cover is called – cash first and then LC or vice versa. Our preference would be for the former, i.e. cash first and then LC. We believe this would also be the Market Operator’s preference as the administrative process for a cash call is bound to be easier than that for an LC call.</p>	<p>2. The order that the MO will call off the different types of Posted Credit Cover shall be passed to the PRC for consideration. Note that the Code allows for the MO to draw down credit cover in any order it chooses (6.233.1). To specify an order in the AP would require a Code Mod. The query will ask the SMO what order it is most likely to go for when drawing down credit cover.</p>	
218	NIE	2.7.3	AP17	Needs to include the procedure for participants withdrawing cash collateral and depositing cash collateral	The process of adding and withdrawing cash from the account is covered in AP9. References will be made to AP9.	The AP was amended
219	ESB	2.7.4	AP17	We understand that interest will be paid quarterly (T&S code 6.23P) in relation to cash in the cash collateral accounts but how often is interest accrued?	This will be passed to the PRC for consideration	Query was passed to the PRC / Mods Committee / Market Trial Working Group
220	ESB CS	2.7.4	AP17	If interest is to be paid quarterly (T&S code 6.23P) in relation to cash in the cash collateral accounts but how often is interest accrued? • Who will be the contact persons in relation to any issues arising from payments or receipts in the	<p>1. This will be passed to the PRC for consideration</p> <p>2. All contact regarding financial issues should be through the help-desk.</p>	1. Query was passed to the PRC / Mods Committee / Market Trial Working Group

#	Respondent	Ref.	AP	Comment	Response	Action
				MO or the MO Bank? Contact list should issue to all participants?		2. No action was taken
221	Synergen	3. 1	AP17	Why does this account information need to be in Agreed Procedure and hence in the public domain. Surely AP17 should allow any participant to request this information from the MO?	This will be passed to the PRC for consideration	Query was passed to the PRC / Mods Committee / Market Trial Working Group
222	NIE	3.1	AP17	Are these the actual banking details?	This will be passed to the PRC for consideration.	Query was passed to the PRC / Mods Committee / Market Trial Working Group
223	ESB	General	AP17	Who will be the contact persons in relation to any issues arising from payments or receipts in the MO or the MO Bank? Contact list should issue to all participants.	All contact regarding financial issues should be through the help-desk.	No action was taken
224	ESB CS	General	AP17	From an overall perspective, ESB has on an ongoing basis continued to highlight its concerns in relation to a lack of transparency in respect of the treasury capabilities of the Market Operator (MO), the interaction of the MO with the MO Bank (National Irish Bank) and the systems and procedures in place given the billions of Euro that will be flowing through the MO and the MO Bank as well as the foreign exchange management required between the 2 currency jurisdictions.	This will be passed to the PRC for consideration	Query was passed to the PRC / Mods Committee / Market Trial Working Group

#	Respondent	Ref.	AP	Comment	Response	Action
225	ESB CS	General	AP17	Who will be the contact persons in relation to any issues arising from payments or receipts in the MO or the MO Bank? Contact list should issue to all participants.	All contact regarding financial issues should be through the help-desk.	No action was taken
226	VPE	General	AP17	Will collateral reserve accounts be held in the name of Danske bank [please define Danske bank details – Reg. Office / Address / Co number etc] or in the name of Northern Bank Ltd and National Irish Bank? VP&E prefer Danske bank as the banking counterparty as Danske bank holds an official credit rating.	NIB and Northern Bank will be the SEM Banks as they specifically meet the requirements of paragraph 6.15 of the Code	No action was taken
227	VPE	p.11	AP17	Page 11 notes that interest will be due payable to collateral reserve accounts, is there a specified interest rate payable i.e.: LIBOR +/- or EURIBOR +/-? [Please specify] Is interest payable on other SEM accounts and is this distributable to the Suppliers at some stage in the settlement cycle? [Please specify]	1. The interest rate on SEM Bank accounts will be that offered by the SEM Bank 2. Interest is accrued on all SEM Clearing Accounts (6.16, 6.17, 6.146). The Clearing Account interest goes to reducing the Market Operator Charge (6.18). The interest payable on the Collateral Reserve Account is payable quarterly, to the account requested by the participant (6.35.1).	No action was taken
228	VPE	P.8	AP17	BACs payments. Currently AP17 states that BACs payments need to be presented to the bank on the day that the invoice is received by the Supplier. After discussions with our bank it appears that the invoice can be presented on the invoice day +1 working day(Monday). This allows ample time for the payment to appear in the SEM bank by 12 noon on the 3rd working day (Wednesday). VP&E	All payments are by electronic methods. Timelines are for example only, and if providers can improve on those timelines this has no impact on the successful operation of the market. Slight redrafting is required to clarify.	The AP was amended

#	Respondent	Ref.	AP	Comment	Response	Action
				would like the AP to be amended to reflect this.		
229	Synergen	Table of Contents	AP17	The table of content is incorrectly formatted.	This will be amended	The AP was amended

3.2 Comments on Circulated Change Requests

#	Respondent	Ref.	AP	Comment	Response	Action
230	Synergen	5.1.1	AP1 (Change Request)	This section states that “ <i>The Participant defines the access roles and rights of its Users</i> ” where Participants can define user roles but not rights and so it this should be amended as follows: “ <i>The Participant defines the access roles and rights of its Users</i> ”	This comment was received after the change control panel meeting. The potential for this change will be raised to the PRC.	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
231	Synergen	5.1.4.2	AP1 (Change Request)	This should be amend to read “ <i>Appropriate users are provided Read-Write access to the “Registration” Functional Area and will be able to access data for all Units for the relevant Participant.</i> ”.	This comment was received after the change control panel meeting. The potential for this change will be raised to the PRC.	Query was passed to the PRC / Mods Committee / Market Trial Working Group.

#	Respondent	Ref.	AP	Comment	Response	Action
232	Synergen	5.1.4.3	AP1 (Change Request)	This section is not explicit regarding what is being applied/reactivated or de-registered. This section should read <i>"Can request to Apply/Reactivate/De-register Units for a particular market participant, by setting the request type to an appropriate value. However, these changes are applied to the system only after it has been reviewed and accepted by the operator."</i>	This comment was received after the change control panel meeting. The potential for this change will be raised to the PRC.	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
233	Synergen	5.1.3	AP1 (Change Request)	What is "Main Organisation Contact"	The "MainContact" is the User who is preloaded by the Market Operator during the registration process and has the same access rights as a "FullUser". There is only one "MainContact" but there may be many "FullUsers".	No action was taken
234	ESB		AP4 (Change Request)	AP4 Section 2.4.3 states <i>"It is not anticipated that Registration Default TOD will change on a regular basis and is considered similar to static data"</i> . As previously highlighted, ESB PG will be submitting a complete refresh of its Generator Parameters for all 48 Units on a daily basis up to Gate Closure as allowed under the TSC. It is expected that the MO process will be capable of supporting this. However, the current drafting of AP4 is concerning as it suggests that the MO may not be able to support Participant business process which are designed in line with the TSC. References to TOD not changing on a regular basis should be removed. Failure of the MO to support the daily refresh of Generator Parameters would be a significant issue for ESB PG.	The AP states that all Technical Offer Data (as defined by the Code) will be alterable in advance of Gate Closure, effective for the next working days. The statement "It is not anticipated that Registration Default TOD will change on a regular basis and is considered similar to static data" does not lessen the obligation on the MO to process changes to such data.	No action was taken

#	Respondent	Ref.	AP	Comment	Response	Action
235	ESB		AP4 (Change Request)	<p>Changes are proposed to several Technical Offer Data items (Generator Parameters) to make them optional (rather than mandatory). These data items are currently mandatory under the MPUD v3.0 and the mpr.xsd. Participant systems have been developed based on the MPUD v.3.0 and mpr.xsd. A re-issue of the MPUD and the mpr.xsd is required ASAP to support this change request if approved. Any amendment of the validation rules in the MPUD v3.0 at this late stage may affect Participant's ability to successfully submit offers during market trials. It is noted that we previously changed our systems to support the change to the MPUD which made all these items mandatory, TSO_CR483 means this will have to be re-worked again.</p>	<p>The Type 3 Channel "Optional" fields do not require a change to the MPUD which defines the fields as mandatory. Build of mandatory fields will fulfill the requirements of optional data provision.</p>	<p>No action taken</p>
236	ESB		AP4 (Change Request)	<p>Amendments are proposed to the validation rules for offer data in AP4. However, it seems further work is required on the validation rules before the change is implemented as several of the table entries do not make sense. For example, the start hour comments include details that are not relevant to the start hour field, such as:</p> <p><i>"The energy_limit_detail element must be present when energy_limit_flag is set to Y. The energy_limit_detail element can not be submitted when energy_limit_flag is set to N".</i></p> <p>Also the structure of the table should distinguish the separate elements (i.e. groups of data for pumped storage, price maker etc). Since these rules must align with the MPUD, a cross reference to a clarified version of the MPUD might be a better approach. Either way this CR should align with the current MPUD and XSDs. Any deviation from the validation</p>	<p>These validation rules in AP4 still require work.</p>	<p>Query was passed to the PRC / Mods Committee / Market Trial Working Group.</p>

#	Respondent	Ref.	AP	Comment	Response	Action
				rules in the MPUD v3.0 at this late stage could affect Participant's ability to successfully submit offers during market trials.		
237	ESB		AP4 (Change Request)	ESB had previously submitted comments to query what the approval process for TOD was. On the Spreadsheet accompanying the APs a comment of 'Amend AP' was added – however we cannot find this reflected in a CR. From an ESB Point of view, it is essential that this process and associated timelines is included. Under current AP arrangements, if we submit an offer at 9.00am D-1 and the MO doesn't get around to approving it, then the previous Approved technical offer will be used at gate closure.	The draft responses to comments circulated to participants have been altered. A query will be raised to the PRC to see if there are other validation rules not described or to be clarified in AP4	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
238	NIE		AP4 (Change Request)	We support that change of the data type to "optional" rather than "mandatory" for Type 3 comms, but we would expect this to be reflected for Type 2 comms as well.	The Type 3 communications mandatory/optional field need not necessarily be reflected in Type 2 communications. The offered flexibility in Type 3 communications was available under the implementation timeframes, whereas implementing this in Type 2 as well would add risk to system delivery. It was decided on principle to deliver what was possible than maintaining the principle of Type 2 / Type 3 consistency. It will be queried as to when the two	Query was passed to the PRC / Mods Committee / Market Trial Working Group.

#	Respondent	Ref.	AP	Comment	Response	Action
					channel types can be aligned	
239	ESB		AP6 (Change Request)	<p>The scope of data publication to be included in AP6 is derived from the TSC. However, the tables omit several items that Participants would expect to be provided. These include:</p> <ul style="list-style-type: none"> - Make Whole Payments (MWPub) - Estimated Capacity Price (ECP) - Capacity Payment Demand Price - Capacity Payment Generation Price - Availability Profiles (APuh) - Actual Availability (AAuh) at D+1 - PES wholesale-calculated Supplier Unit volumes in both jurisdictions <p>1. Half-hourly jurisdictional supplier-aggregate second-tier Supplier Unit volumes</p>	<p>These items should be contained (or be inferable from data provided) in Invoices or Settlement Statement so individual Participants should receive these data.</p> <p>If Participants require these data, they will need to persue these requirements through the Modifications Committee</p>	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
240	NIE		AP6 (Change Request)	<p>We would have expected to see some statement around data publication regarding the data files that were to be published as specified in the paper "Decision on Commercially Sensitive Data under the SEM" - AIP/SEM/07/120 in particular - Half-hourly jurisdictional supplier-aggregate second-tier Supplier Unit volumes.</p>	<p>A CR has been raised to facilitate this decision but as stated in the decision paper the implementation of this CR is subject to resource constraints in the SEMIT implementation. Prioritisation of a report not contained in Version 1.3 or Version 2.0 of the Code would add risk to the delivery of reports currently there.</p>	Query was passed to the PRC / Mods Committee / Market Trial Working Group.

#	Respondent	Ref.	AP	Comment	Response	Action
241	ESB		AP9 (Change Request)	Application of VAT to Credit Cover impacts PMO. The drafting of AP9 suggest the MO's Credit Cover calculation do not match the TSC (and hence PMO implementation). MEDIUM IMPACT – will lead to an expected change to PMO credit cover calculation once finalised.	AP 9 states that Actual Exposure is based upon invoiced amounts and therefore includes currency costs. The TSC does not include currency costs in the calculation of Actual Exposure. On 29 June a note was published on the AIP website identifying the discrepancy between the TSC and AP9 and advising participants to develop their systems on the basis of the AP9 approach.	No action was taken
242	ESB		AP9 (Change Request)	The proposed clarification to the treatment of VAT in Credit Cover is inconsistent with the TSC v2.0. It is stated that both VAT amounts and currency costs will be taken from unpaid invoices. The TSC v2.0 Actual Exposure calculations do not include VAT or currency costs from unpaid invoices. In addition, the CER has confirmed that the calculation of Actual Exposure amounts from issued invoices should not include VAT and Currency Costs as these will be reflected in the Fixed Credit Cover requirement. Participant's credit cover forecasting systems have been developed based on the TSC drafting and clarifications issued by the CER. This proposed change to AP9 suggests the MO credit cover systems are not aligned with the TSC. It appears further discussion between the CER and MO may be necessary to establish a common view on the implementation of the credit cover calculation, with any necessary clarifications clearly communicated to Participants. TSO_CR848 should not be	On 29 June a note was published on the AIP website identifying the discrepancy between the TSC and AP9 and advising participants to develop their systems on the basis of the AP9 approach. VAT and Currency Costs are not included in the Fixed Credit Cover, only a level of credit to deal with Resettlement. As far as changes to the	No action was taken

#	Respondent	Ref.	AP	Comment	Response	Action
				approved until this process has been completed. This change request can not be approved without amending the TSC since the application of VAT to the Credit Cover is still undefined in the TSC v2.0. The TSC currently includes the variable VATpr in the calculation of Required Credit Cover but does not define its calculation. This issue with the TSC has previously been raised several times by Market Participants but remains unresolved.	TSC and to APs are concerned; these documents have now been designated and can only be modified through the modification processes set out in Section 2 of the TSC.	
243	Synergen	Appendix 2	AP9 (Change Request)	This appendix needs re-drafting so that it is clear which VAT rate is applied for each of the numbered points as point 3 refers to a “future” rate whereas the others do not. Does the same future rate apply or does a current rate apply in points 1 and 2?	There is only one blended VAT rate. This comment was received after the change control panel meeting. This query will be raised with the PRC.	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
244	Synergen	Section 2.4	AP9 (Change Request)	There should be a minimum review period and therefore the last paragraph of this section should be amended as <i>“The MO shall perform periodic reviews (at least annually) of Credit Cover Providers on its published list to check if they continue to meet the Banking Eligibility Requirements. The Market Operator shall update the published list as necessary.”</i>	This comment was received after the change control panel meeting. The potential for making this review subject to a minimum period will be passed to the PRC.	Query was passed to the PRC / Mods Committee / Market Trial Working Group.
245	NIE		AP9 (Change Request)	We support the updates to the text regarding VAT and credit cover	No response	No action was taken

3.3 AP-Related Comments on PRC Query Log

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
ESB CS	1	AP15; MPUD	<p>Will a Participant with Generator and Supplier Units receive separate Invoices and Settlement Statements for Supply and Generation? Will a Party need to register separate Participants for its Supplier and Generator Units? AP 15 (v2.1) states that “where a Participant has both Supplier Units and Generator Units, this Participant will receive separate invoices, i.e. an Invoice in respect of the total charges for its Supplier Units and a Self-Billing Invoice in respect of the total payments to its Generator Units.” The Market Participant Update Document (v1.0) suggests Settlement Reports, Participant Information Reports and Invoices are provided by market and participant i.e. there is one report per Participant per Market (energy/capacity) which will cover both Supplier and Generator Units. This seems to say that a Participant will receive a single invoice with separate elements for each charge type (e.g. an energy invoice will be received with separate items for energy payments to</p>	<p>The T&SC allows a single Participant to own both Generator and Supplier Units. However, in order to comply with VAT requirements (that receivables and payables are invoiced separately), it is necessary that within the SEM Central Market Systems a Participant's Generator Units will be registered as a separate Participant within the systems from that Participant's Supplier Units (except in the case that this is a Participant who is registering the Trading Site Supplier Unit and availing of the specified netting calculations as set out in section 4 of the T&SC). This means that from a system perspective, a single Participant with both Generator and Supplier assets will appear as two Participants. This has resulted in the confusion between documents that is highlighted here. To</p>	<p>No change was made to introduce the term account. Instead, the term Participant ID was used to denote that a single Participant may have several Participant IDs in Agreed Procedure 1.</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			Generator Units and charges for Supplier Units and the total amount due will reflect the net charge). Does this mean the overall invoice amount due will be net across Generation and Supply Units?	<p>clarify this position, we propose that we will revise our documents to refer to the internal system participant as an "Account".</p> <p>Therefore we can state that -</p> <p>a Participant who owns both Generator and Supplier assets will be registered within the central market systems with a Generator Account and Supplier Account;</p> <p>a Participant who owns both Generator and Supplier assets will receive separate invoices and settlement reports for each Account for each Market (and for Market Operator Charges);</p> <p>these provision do not apply in the case that this is a Participant who is registering the Trading Site Supplier Unit and availing of the specified netting calculations as set out in section 4 of the T&SC.</p>	
ESB CS	3	AP 13 / AP15	Please confirm whether an Invoice associated with an Ad-hoc Settlement Re-Run will be based on the latest available Settlement Statements for each of the Settlement Days in the relevant Billing Period in the situation where only a subset of the days from the	This will be included in the next version of AP15, which is targeted for publication by the 14th May 2007.	AP15 (2.1.2) states that the Settlement Rerun (used in the event of an ad hoc data query) shall be based on Settlement Re-Run Statements which include

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			Billing Period have been re-run?		Settlement Statements produced for all Days in the Invoice. Those Settlement Statements would be calculated on the latest available information.
ESB CS	4	AP 13	AP13 (v2.0) section 3.1 states that Settlement Statements will indicate if a data item is subject to an outstanding query. There is no mention of Query flags being provided in the Settlement Statements or Participant Information Reports in the Market Participant Update Document (v1.0). Please clarify if there will be query flags provided.	Query flags will not be provided. There was difficulty with the implementation of the query flags. To resolve this issue, the query flags will be removed from the systems and the AP will be updated to reflect this.	No change
ESBI	6	AP9	The SMO may issue a Suspension Order to Participants which will include a requirement for the Participant to re-instate their posted collateral levels within a defined period of time. 1) How is this defined period of time decided? Is it based on a mutual agreement between Market Participant and MO, or set exclusively by the MO? 2) Will this period of time, take into consideration a dispute process on the credit cover increase notice? For example, if there was a major mistake made in the calculation of credit cover risk, and the supplier felt there was a legitimate case to	The time by which participants must re-instate their posted collateral levels within 2 days. This is set out in the T&SC v 1.3, section 2.216. The suspension order is not issued until the 2 days have elapsed. This will not take into account any disputes on the credit cover increase notices. Participants will not be suspended from the market without the explicit approval of the RAs.	No change

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			<p>dispute the increase, do they still have to post additional collateral, even though it may be unrealistic for the supplier to do so. 3) Does the MO have tolerances in place, that would identify if there has been any major inaccurate calculations carried out on Credit risk per participant before issuing Increase Notifications?</p>		
ESB CS	7	AP4; MPUD	<p>The Market Participant Update Document (V1.0) defines the Technical Offer Data required for Generation Units in sections 5.3.5 and A.2.5. Agreed Procedure 4 (v3.0) P35 provides the same information. Data items MAX_RAMP_UP (GP-16) and MAX_RAMP_DOWN (GP-17) are included in the Generator Parameters. Our Understanding is that these values only relate to Demand Side Units and should not appear in the Generator Parameters. The data items should be removed from the Generator Parameters or clarification provided on whether or not Participants will be required to submit these data items for Generator Units.</p>	<p>The T&SC has been revised to reflect the systems build of the Central Market Systems. Any conflicts between the T&SC and the MPUD will require MPUD revisions.</p>	<p>Maximum Ramp Up Rate for Demand Side Units and Maximum Ramp Down Rate for Demand Side Units are now defined as Optional for type 3 channel. The Type 3 communications mandatory/optional field need not necessarily be reflected in Type 2 communications. The offered flexibility in Type 3 communications was available under the implementation timeframes, whereas implementing this in Type 2 as well would add risk to system delivery. It was decided on principle to deliver what was possible than maintaining the</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
					principle of Type 2 / Type 3 consistency. It will be queried as to when the two channel types can be aligned. This altered query was passed to the PRC / Mods Committee / Market Trial Working Group.
VPE	8	AP6; MPUD; SPUD	To aid the creation of the process/publication mapping, would it be possible for us to obtain Word versions of AP6 and the MPUD/SPUD from the SEMIT team?	The answer is No they cannot be. As a matter of policy, security etc. we produce as much information as we can for participants and others, but in a form which cannot be edited and misrepresented.	Word versions of all Code and AP documentation, including Visio diagrams are available on request
ESB CS	9	AP4 v.3	Under Unit (Resource) data in AP4 there is a data item specified as fuel type. The list of fuel does not include peat or distillate. We have units which use both these fuel types. What do we submit for these units? Is this data item utilised in MO systems?	The systems have been changed to accommodate this change. The list of fuels now includes peat, distillate and nuclear.	No change
BGE	13	TSC; AP15	The T&SC and AP15 have conflicting publication dates for Indicative Settlement Statements and Initial Settlement Statements. A query was raised on the Participant Feedback Comments Management spreadsheet (issue 56) for clarity and were advised that a change request	The T&SC is aligned with the Central Market Systems. Please refer to the timelines in T&SC section 6 for the correct timelines. If there are any discrepancies between the T&SC and AP6, the T&SC takes precedence. AP6 will be	AP15, AP6 and the Code should now be aligned vis-à-vis the timing of all Settlement Statements.

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			would align these dates. RA334, which mentions the relevant changes to the code, was rejected. Has another change request been drafted to align these dates?	modified in the coming weeks to align with the T&SC.	
ESB CS	16	APs / T&SC	There are differences between the AP and the Trading and Settlement Code. Can participants presume that one rather than the other is correct or should participants raise each issue individually until the change control procedures have been completed.	At this point in time, Agreed Procedure 6 more accurately reflects the system build. Changes requests to align Code and AP6, where different, will occur during the first quarter of 2007, at which point the TSC will take precedence.	APs and the Code should now be aligned
ESB CS	21	AP 1	Will full registration from party to participant to registering all units be expected to occur by May 25th? If so, will the timelines be compressed?	The registration process for existing participants will be an abbreviated process and will not strictly follow the process as set out in the AP. The SOs are working out the details of this process, which is due to be published in February. Registration data for parties/participants and units for market trial is expected to be finalised by April 27. We published the timelines at the last BLG. The registration data will then be uploaded in SEM systems. For Go live -there will be an agreed process by which data can be updated but these	See Section 8 of the Code which contractually sets out the requirements for those registered for market trial to complete "live" registration. Those not registered for market trial will register under Agreed Procedure 1.

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
				dates have not been agreed yet. It is unclear what is meant by compressed timelines.	
VPE	24	AP2 / T&SC	In the event of a revision to ATC” - AP2 4.3.1 is inconsistent with the Code (5.59) which refers to a change in Aggregate Availability rather than ATC. Which is correct?	The reference to Aggregate Availability has been removed from section 5.59 of the T&SC v 1.3. Any further conflicts between v. 1.3 and the Agreed Procedures will be addressed during the finalisation of the Agreed Procedures.	The correct term is ATC. The Code has been corrected to align with the correct term in AP2.
ESB CS	37	AP6 / AIP-SEM-236-07	AP6 states that the Maintenance Schedule Transaction - Generator Outage Schedule will be published to the General Public. The recent Decision on Generation and Transmission Outage Planning states "Generators outage plans are confidential to the individual generators and the TSO and therefore cannot be published. Please provide clarity on whether this information will be published to the General Public.	Maintenance Schedule Transaction - Generator Outage Schedule will be published. The RAs will issue a revision to their Decision on Generation and Transmission Outage Planning. Subsequent changes may also be required in the Grid Codes.	The RAs issued a revision to this decision in AIP/SEM/07/120
ESB CS	40	T&SC / AP4	For Wind generator units which are classified as Variable price takers, it should not be necessary to input variables such as dwell times, load rates, ramp down rates ramp up rates, soak times cold, soak time hot. The only Technical data relevant is MINGEN and MAXGEN as a wind	Page 27 of the MPUD http://www.allislandmarket.com/assets/?id=473ecb1d-9bf0-4f9c-ad11-724455922a9f details what information is required from Variable Price Takers (VPTG) – checking that table it has the following note:	The Code currently requires all such technical data to be submitted by all Generator Units (see I.12). Following clarification of the non-required fields for VPT

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			<p>turbine does not have any breakpoints or ramp rates like a thermal generator. Please confirm what information must be submitted as part of the different offer sections for the different generator types.</p>	<p>“Price Taker Parameters (mandatory for Price Takers, excluding wind units and autonomous units or Units Under Test)”. Furthermore, the following table 5.3.5 which indicates the Generator Parameters identifies these items as optional – therefore there is nothing in the MPUD to say that this information is mandatory. Agreed that further clarification is required during the registration process, where this Technical Offer Data (as it is called in the Code) will be updated. The Code provides further information saying that these type of data are required for Variable Price Takers (see Appendix C in Version 1.2 of the Code). This will be reviewed by the RAs. Page 27 of the MPUD http://www.allislandmarket.com/assets/?id=473ecb1d-9bf0-4f9c-ad11-724455922a9f details what information is required from Variable Price Takers (VPTG) – checking that table it has the following note: “Price Taker Parameters (mandatory for Price Takers, excluding wind units and</p>	<p>Generator Units, this should be brought into the Code. This query was passed to the PRC / Mods Committee / Market Trial Working Group.</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
				<p>autonomous units or Units Under Test)". Furthermore, the following table 5.3.5 which indicates the Generator Parameters identifies these items as optional – therefore there is nothing in the MPUD to say that this information is mandatory. Agreed that further clarification is required during the registration process, where this Technical Offer Data (as it is called in the Code) will be updated. The Code provides further information saying that these type of data are required for Variable Price Takers (see Appendix C in Version 1.2 of the Code). This will be reviewed by the RAs.</p>	
				<p>UPDATED by SEMIT on 26 Feb Section 5.3.5. Generator Parameters Element Data: Submission of the Market Participant Update Document (MPUD) shows information relating to the optional/mandatory fields. For clarity, ramp rates and no break points are not mandatory. The systems currently require</p>	

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
				<p>a some mandatory values for unit types (inclusive of wind generator units) . There is an amount of work being carried out to ensure those fields which can be considered optional for units are treated as such. SEM will be providing participants with assistance with respect to the values to enter for certain technical data values prior to Market Trials. If the MPUD document does not provide you with sufficient information, please inform SEMIT of the particular extra information you need.</p>	
ESB CS	41	T&SC, MPUD, MIP	<p>Will a Participant with Generator and Supplier Units receive separate Invoices and Settlement Statements for Supply and Generation? Will a Party need to register separate Participants for its Supplier and Generator Units? AP 15 (v2.1) states that “where a Participant has both Supplier Units and Generator Units, this Participant will receive separate invoices, i.e. an Invoice in respect of the total charges for its Supplier Units and a Self-Billing Invoice in respect of the total payments to its Generator Units.” The Market Participant Update Document (v1.0) suggests Settlement Reports, Participant</p>	<p>AP 1 needs to be updated with the registration information for generator and supplier units for particular participants, noting the interaction with VAT invoicing rules. This will be set out in AP1, which is targeted for publication by the 14th May. The current registration workshops will provide interim clarifications.</p>	<p>Section 2.2 of AP1 details that a Participant may have more than one Participant ID when it registers both Supplier Units and Generator Units</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			Information Reports and Invoices are provided by market and participant i.e. there is one report per Participant per Market (energy/capacity) which will cover both Supplier and Generator Units. This seems to say that a Participant will receive a single invoice with separate elements for each charge type (e.g. an energy invoice will be received with separate items for energy payments to Generator Units and charges for Supplier Units and the total amount due will reflect the net charge). Does this mean the overall invoice amount due will be net across Generation and Supply Units?		
Synergen	45	AP6	Some reports are being published in CSV format, others in XML. Please identify which reports will be in which format.	This information is contained within the Reports Definition Document, published 31 st January, which can be accessed at http://www.allislandproject.org/changecontrol.htm	Recent development work on the SMO Website details this type of information for the public website. Note that some publications are also in .pdf and .xls where the data is not relevant to the central market systems.
ESB CS	47	AP10	Will the Settlement Reallocation reports be available through the MPI, type 3 comms channel? If so, will AP6 and the MPUD be updated to reflect this? If so, please give the dates for these updates.	Yes this report will be made available through the MPI via type 3 comms. This will be updated in AP6 and MPUD. AP6 will be revised by 14th May.	The timing of the report is now detailed in Section 5.3 of AP6. It is a Private report.

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
NIE	48	AP10	Is the maximum number of reallocations per trading period 6 energy and 6 capacity or is the total number of allocations 6, i.e. 3 energy and 3 capacity?	The maximum number reallocations is 6 capacity AND 6 energy per trading DAY. This however is a guideline and reallocations in excess of this can be accommodated in practice.	No change
NIE	49	AP6	Should a Capacity Invoice be included in AP6, Appendix 1?	Correct, list includes initial settlement but not the initial invoice. Capacity invoice will added to the AP when they are next reviewed by the Ras	AP6 Section 5.3 now contains detail of the Settlement Statement reports. All detail of the issue of invoices are set out in AP15.
NIE	56	AP9	Are all settlement Reallocations posted against a trading day that falls into the credit risk period summed, then deducted from the participants calculated exposure to define the collateral that is required?	This is our understanding – yes. Settlement Reallocations posted within the exposure period are taken into account when calculating the cover that is required	No change, except strengthening the statement of “understanding” to one of fact.
NIE	57	AP10, v. 2.1	The AP states that “where a participant has offered more settlement reallocation than their likely settlement, the SMO will cancel agreements in the reverse order in which they are received” – is the likely settlement an assessment of the totality of the likely invoice or is it assessed per trading day? In theory therefore could our counter party	The assessment is carried out at the end of the week against the total weekly invoice amount. Therefore, one settlement reallocation could be successfully submitted and processed with respect to a Trading Day that is greater than that Participant’s volume of energy for that Trading Day,	During the Agreed Procedure edits to the go-Active versions, the expression “that it expects to receive” remained in the following statement in 3.2.2: “The Settlement Reallocation Agreement causes the

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			submit one settlement reallocation into trading day one to cover the likely entirety of the invoice and not have that reallocation rejected – assuming that it is not more than the invoiced amount?	less than the total volume of energy for the billing period.	Debited Participant to cover more than the Trading Payments or Capacity Payments that it expects to receive under the Code in respect of its Generator Units for that Settlement Period”. This “expectation” is not appropriate, as cancellation only occurs as a matter of fact at the time of invoice creation. This query was passed to the PRC / Mods Committee / Market Trial Working Group.
Airtricity	60	T&SC v1.1; AP1	What is the decision on the use of Intermediaries by Party’s in managing their participation in the Market?	The RAs expect to publish a decision on the Use of Intermediaries by the 7th February 2007.	The decision was published on the 28 th of February (AIP-SEM-07-29). AP1 and the Code reflect this decision.
Airtricity	61	AP9	Why is AP9 being prescriptive on the minimum level of cash that should be put up in providing for Credit cover? At current it is 50% of collateral as cash. Participants should be able to structure their provision of Credit cover using whatever combination combination of securities (cash or	The concept of a minimum cash component has been removed from the AP. It is anticipated that version 1.3 of the T&SC will contain a template for the format/requirements for a letter of credit.	The template for the letter of credit is now contained in the Code.

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			LoC) that meets their business needs, provided that such securities meet the requirements agreed upon.		
VPE	63	AP4; AP6; T&SC	Is there a definitive list of all the possible technical parameters that can be submitted by generating units into the SEM and is this list available to market participants? There seems to be a level of inconsistency between the technical parameters listed in AP 4 [Unit (Resource) Data] and the T&SC Appendix C – C.6.	The Unit (resource) Data is just a subset of the Technical Offer Data which is in the T&SC. All the remaining TOD, parameters etc. is contained in AP4.	The lists of data should be complete. As noted in the response above to Comment 40, there are still some late-breaking information required from the mandatory/optional field. Furthermore, there has been a parallel request to ensure that identical terminology is used between the Code and the AP, or that a mapping is performed. This query was passed to the PRC / Mods Committee / Market Trial Working Group.
VPE	64	AP4; AP6; T&SC	Can you clarify whether the submitted technical and commercial offer data of all units will be made available to all market participants by the SMO. There seems to be some inconsistency between Appendix E – E.7 of the T&SC and AP6 Appendix 2 relating to what (and whose) technical data will be made available.	Yes, technical and commercial offer data of all units will be made available to all market participants by the SMO. This is set out in Appendix K of the T&SC.	Please note that the form of this web-based publication is still under development. There are no plans at this time to support these reports over the MPI.

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ESB PG	68	AP15	<p>Clarification required on section of AP 15 re section 3.6 unsecured bad debt.</p> <p>The wording on unsecured bad debt indicates that the 'SMO is required to reduce the amount of Generator payments so as to balance the settlement for that period'</p> <p>It then goes on 'This charge will be applied to a future invoice for each participant for their generator units'</p> <p>How does the MO intend to reduce income here?</p>	<p>This query remains outstanding. It will be addressed in the next version of AP 15, targeted for publication by the 14th May.</p>	<p>The market is designed to balance in each Settlement Period. Therefore the adjustments will be made in the self-billing invoices for the period for which the bad debt occurred. This is stated in AP15.</p>
ESB PG	70	AP1	<p>Will a Participant with Generator and Supplier Units need separate Digital Certificates for its Generator Account and Supplier Account?</p>	<p>Later clarification: No, a single digital certificate will be provided per participant, irrelevant to their specific account type.</p> <p>Original answer: After registering its first Unit within a jurisdiction, a Party becomes a Participant in the SEM. A Participant will receive a Participant ID when it participates. The Participant ID is a unique identifier under which Units are gathered for the purposes of:</p> <ul style="list-style-type: none"> · Self-Billing Invoices/Invoicing; and · Have sole access to the 	<p>The later clarification to the query was incorrect. The original answer was correct.</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
				<p>data in relation to those Units through a unique digital certificate.</p>	
				<p>The single Participant ID, the one type digital certificate with a unique key, and single invoice are all inextricably linked.</p>	
				<p>If a Party wishes to register Generator Units and Supplier Units, the Party will be required to register these Units separately under a Generator Unit-only Participant ID and a Supplier Unit-only Participant ID. (Note that the Generator Unit-only Participant ID will also have registered to it the Trading Site Supplier Units). Consequently the Party will have two unique digital certificates each of which can access a non-overlapping subset of its registered Units, and receive two separate Self-Billing Invoices/Invoices in respect of its Units. In terms of the legal drafting of the Code, this is not considered multiple Participation – this is an implementation of a single Participant registration that happens to procedurally</p>	

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
				require two identifiers, two digital certificates with different unique keys, and receive a Self-Billing Invoice and an Invoice within a Jurisdiction. This procedural implementation of a Participant registration is required for the purposes of appropriate VAT billing, i.e. VAT cannot be levied on a net-invoiced amount.	
ESB CS	83	AP2	What is the status of the comment on P7 of AP2. When will MPs have clarity on this?	The comment will remain in the Code. There will be no changes to ATC as a result of constraints in the SEM which do not relate to the availability of the Interconnector.	No change
ESB CS	84	AP2	How are MPs notified of changes to ATC. How and when are recalculated MIUNS are published - what does 'As soon as possible' mean	Interconnector Users will be notified by MITS of changes to the ATC, as per the current process (text messages). The information will be published to MPs by the SMO on the following day.	No change
ESB CS	85	AP2	MPs need access to changes in ATC as soon as they occur - how can this be achieved given the reqt to poll only once every 24 hrs. If this is a reqt then the changes to ATC must remain publicly available	As above, Interconnector Users will be notified by MITS of changes to the ATC, as per the current process.	No change
ESB CS	86	AP2	For exports into the UK on interconnector how are PQ pairs submitted in terms of sense i.e positive or negative price,	For exports into the UK on the interconnector, price would be submitted as usually submitted to the SMO (i.e., negative	No change

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			positive/neg qty	prices only when expecting to pay the SMO for exporting). Quantity is submitted as negative when wishing to export to the UK and positive when seeking to import. A worked example has been distributed by the MP Representatives.	
ESB CS	87	AP2	It is important that full interconnector interaction is a feature of market trials. Is this intended?	Yes, it is intended that interconnector interactions will be a feature of market trials.	No change
ESB CS	88	AP2	MPs need a process diagram showing the interaction between the current process and the SEM process, clearly showing how the business process will work end to end in the new market	Interconnector processes are mapped in AP 2	No change
ESB CS	89	AP2	Clarify what happens when an ATC reduction occurs before UK gate closure? What happens after gate closure in UK?	If there is a change in ATC before UK Gate closure and in advance of SEM Gate Closure, participants will have the opportunity to modify their bids. If the change in ATC is after SEM gate closure, the I/C dispatch quantities will be locked within the SEM. The MITS system will notify Interconnector Users that the ATC has changed. For settlement, participants MSQs will be considered to be the quantities set out in the IMS run. Participants MIUNs will	No change

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
				remain constant regardless of changes in the ATC. If participants do not produce the MIUN, they will be assessed a constraint charge.	
ESB CS	90	T&SC, Appendix C, Table 13, AP4-Transaction Submission and Validation, version 3,	Deleted - duplicate of query # 40.	Participants MIUNs will remain constant regardless of changes in the ATC. If participants do not produce the MIUN, they will be assessed a constraint charge.	Comment is in relation to a different comment. See response to query #40 above.
ESB CS	94	AP6	Back in November we received change marked versions of all of the APs which had been amended as a result of the three day workshop. The version of AP 6 we received was not fully marked up (only the introductory pieces were highlighted) and so one of the participants has been in touch with myself as MP rep to request that a fully change marked version be made available. Can you provide a fully marked up version for distribution to all participants?	All published technical documents can be found on the AIP website : http://www.allislandproject.org/changecontrol.html	No change; marked up versions of the go-Active APs (from the previously baselined versions) are available on request.
ESB CS	95	AP6	The Market Power Workstream has said that all bid and offer data of each participant should be visible to every other participant. From the response below it is clear that the MO is not providing this. The MO has said that they have not received any request from the	Bid and offer data of all participants will be published as per Appendix K.	No change, noting that these reports will be published over the website and that there are no plans to support these reports over the MPI at this time.

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			Regulators to make this data available. What is the position on this? How will participants access other participants bids and offers?		
ESB CS	111	AP1 – Participant and Unit Registration	If a participant is an intermediary for a unit, and a digital cert applies to that unit and the units belonging to the participant, and that intermediary unit is revoked please confirm that the same digital certificate can still be used for the remaining units of that participant and that data for the revoked unit is no longer accessible.	Yes - the same digital certificate can still be used for the remaining units.	No change
ESB CS	113	AP6 (p 15)	<p>An assumption has been made from ESB CS, based on AP 6 that many of the Type 3 reports (i.e. via MPI) are also available via Type 2 (i.e. SMOW report). However, having reviewed the most recent 'Reports Definition Document', dated 31/01/2007, there is no clear indication that the Type 3 reports are also available as Type 2.</p> <p>Example: Can we assume that 'Monthly Load Forecast' is available both through Market Participant Interface as well as a being available through the Corporate website (SMOW report).</p> <p>Can you please clarify this query for us?</p>	<p>In the Report Document definition issued on the 31st of Jan.</p> <ul style="list-style-type: none"> - Any Market System Reports and Settlement reports are available through type 2 and type 3 communication channels. - Any SMOW reports are accessible through the SMO website. <p>However, potentially some SMOW reports may be also accessible through MPI (type 2 and type 3) and vice versa. This is under discussion with the RAs.</p> <p>Final list of reports and accessibility will be clarified</p>	Agreed Procedure 6 details the reports published on the website (Section 5.2), details which of these are also available over the MPI, and detail reports only available over the MPI (Section 5.3)

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
				with the next version of the Code. This query will remain open until this final listing has been published.	
ESB CS	123	AP 13	<p>Currently in the process flow diagrams on page 11 and page 12 of AP13, it appears that the market participant is not informed if the data query or settlement query is low or high materiality as this is calculated by the SMO after determination. Will the market participant be notified of the materiality of the query is the participant notified when the query is going to be reflected in the settlement statements/invoice</p> <p>Will the data query and settlement query have an ID/ reference no?</p> <p>Will this query ID/ reference number be on the settlement statements/ invoice, linking query to settlement statement/invoice and vice a versa</p> <p>Will the determination submitted by SMO have the settlement statement/ invoice reference number on it, which will link query to settlement statements/ invoice?</p> <p>How is the Participant (ESB CS) meant to know if the change in settlement statement/ invoice is their query raised or another participant</p> <p>How is a participant expected to track which queries have been closed or still outstanding?</p>	The RAs recognise that this remains a gap in AP13. This will be included in the next version of the AP which will be published by the 14th May.	The go-active AP13 allows for participants to review the SMO's determination of materiality, linking to a dispute if there is disagreement.

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
ESB CS	124	AP 14- DISPUTES	Dispute resolution form must be returned within 5WD of the disputing counterparties reaching an agreement. If settlement statements/ invoices are expected to be updated, the likely event it will not be possible to check the settlement statement/ invoice prior to sending the dispute resolution form, therefore if the settlement statements/ invoice does not reflect dispute decision, the dispute must be reopened. Does the dispute resolution form mark the end of the dispute to the SMO .Will participants be able to reopen the same dispute after sending the dispute resolution form if the dispute has not been dealt with	The RAs would suggest that participants in the first instance should raise a data query, rather than a dispute. A dispute should be the last step in the process. If a participant has sent in a dispute resolution form, but find the dispute has not been resolved, participants will need to raise another dispute. This will be set out in further detail in the next version of AP14, which will be published by the 14th May.	This has not been updated in the AP. AP14 was subject to a more rigorous legal review given the nature of the subject matter. Consequently, repetition of Code provisions was eschewed. Paragraph 2.315 of the Code details what can occur in the event that the settlement
ESB CS	125	AP 14 – disputes	If dispute is referred to arbitration, will the dispute still be settled through SMO adhoc settlement statement or will it be done externally	If the result of arbitration is that the dispute must be settled through the Central Market Systems, the dispute procedures will be sufficiently robust to accommodate this. The dispute procedures are expected to be published by the 12th May.	The form of the decision of the arbitration may or may not require a settlement statement. Arbitration is an exit from the dispute procedure – it is not part of the procedure itself. The dispute procedures (as are all APs) are silent on the

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
					nature of the potential outcome of arbitration. That said, the facility to run an ad hoc resettlement remains technically feasible at all times.
ESB PMO	128	TSC (v1.2), AP 9 - Credit Risk Management (v2.0) and Rules of Credit Risk (v0.5)	<p>Clarification is required around the prevailing baseline and timescales for finalisation of the Credit Cover Rules.</p> <p>The all Island Project Website states that the "Version 1.2 of the Trading and Settlement Code more accurately reflects what is currently being implemented in the systems. However change control has not yet been fully completed on this area. When this process is completed the outcomes will be communicated to Participants through this website and through the Participant Representatives." There are also differences between the TSC (v1.2), the Rules of Credit Risk document (v0.5) and AP 9 - Credit Risk Management (v2.0).</p> <p>Participants are currently trying to develop systems that recreate the Credit Cover calculation in order to forecast Credit Cover requirements such that appropriate levels of cover can be maintained and to verify increase requests received from the MO. It would be helpful to receive</p>	The Code reflects the workings of the Central Systems. The detail of credit cover calculations is largely removed from AP9. If there is any further subtlety to the rules in the T&SC, they will be set out in AP9. At the time of writing, such "subtleties" are not known to exist.	The treatment of VAT has been detailed in AP9, but has been subject to further queries. Other queries are not dealing with specific issues in this regard.

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			<p>further guidance on the timeline for finalising the credit rules, the current “best view” of the rules that will be implemented and (as far as is possible at this stage) clarification on the expected approach to the finalised calculation as follows:</p> <p>Baseline Questions:</p> <ol style="list-style-type: none"> 1. At the current time does the TSC (v1.2) or the Rules of Credit Risk document (v0.5) better reflect the rules of Credit Risk that will ultimately be implemented? 2. When is it expected that the finalised rules of Credit Cover be available to Participants? <p>Clarifications on calculation:</p> <ol style="list-style-type: none"> 1. Is it expected that the finalised Credit Cover calculation will apply to both Supplier and Generator Units (as set out in the TSC) or just Supplier Units (as set out in the Rules of Credit Risk document)? 2. Is it expected the statistical analysis over the historical assessment period will be based on half hourly samples or aggregate samples of duration equal to the time to remedy period? For example, TSC section 6.168D appears to take the 95th percentile Half Hourly SMP based on the entire HAP, whereas the rules of Credit Risk document appears to take a 95th percentile aggregate price for the duration of 		

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			<p>the time to remedy period (requiring sampling an aggregate price for each possible continuous period equal to the time to remedy in the HAP). The rules in the TSC seem less complex to implement but more likely to over estimate a Participants exposure. The approach in the rules of credit risk document seems more realistic as it is unlikely that the 95th worst case SMP will occur in every half hour in the time to remedy period.</p> <p>3. Is it expected that there will be separate Historical Assessment Periods for Capacity and Energy (as suggested by the TSC v1.2 section) or a single number of days that applies to both capacity and energy (as stated in the rules of Credit Risk Document Step 1)?</p> <p>4. Is it expected that the Historical Assessment Period will be a set number of days prior to the relevant billing or capacity period (as set in the Rules of Credit Risk document) or be defined in relation to each billing/ capacity period individually (as suggested in the TSC v1.2 section 6.147)? For example the HAP for a Capacity Period Jan 09 could be defined as X days preceding the Capacity Period. Alternatively the HAP for Capacity Period Jan 09 could be defined as a particular window of days (e.g. 1 Jan</p>		

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			<p>to 28 Feb 08).</p> <p>5. How is it expected Fixed Credit requirements will be applied? The TSC defines a value per Unit that is held in addition to the calculated exposure for Supplier Units and Generator Units (i.e. required credit = estimated exposure + sum of per unit fixed amounts). AP 9 suggests that there is a fixed minimum amount per participant that always applies even if the calculated exposure is less than the fixed level (i.e. required credit = MAX[estimated exposure, fixed amount per participant]). The AP seems more reflective of the true exposure.</p> <p>6. How will the Required Level of Credit Cover for VAT be calculated? The applicable VAT charge for the Participant p in Settlement Risk Period r (VATpr) is not defined in the TSC.</p> <p>7. Are forecast volumes submitted by participants and used in the Credit Cover calculation for new/adjusted participants daily or half hourly values? For example the TSC defines "a half hourly Credit Assessment Volume for a New or Adjusted Participant p (CAVGph)", the Rules of Credit Risk Document defines daily average value ("Q is the daily forecast quantity for Participant 'p'")</p>		

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			<p>8. Is it a correct interpretation that a Participant will be required to hold a fixed level of Credit Cover for its Generation Units even if it is due an overall payment in the risk period?</p> <p>9. Is it a correct interpretation that a Party with two participants (one in ROI & one in NI) would need to manage 2 separate credit cover requirements? i.e. Credit Cover is at a participant level and there is no netting at a Party level.</p>		
Airtricity	133	AP10 v. 2.0	<p>“... Settlement Reallocation Agreement will be included in the invoicing process if it meets the eligibility criteria. Participants will be notified of the Settlement Reallocation Agreement eligibility via the publication of the Settlement Reallocation reports which ... will be published on completion of the indicative and initial settlement of the final day of the Billing or Capacity Period.” AP10, 4.2.1Based on the wording above Settlement Reallocation Agreements will have to pass through an eligibility filter which becomes available in a report 1 day after the submission window has closed for the relevant Billing or Capacity Period, at which stage Participants can do nothing about it. Is this the intent of the eligibility report?</p>	<p>The Settlement Reallocation Report is not intended as an "eligibility report". This is intended to advise Participant's what reallocations have and have not been applied on a given Invoice. The timing is correctly noted that the report is only available after the completion of Invoicing which is one day after the final submission of reallocations.</p>	No change

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
VPE	139	AP1	To what extent, having registered, can the registration details be amended? For instance, can the company be changed where the company changes or it is purchased by another entity? Given the time-lines for registration / de-registration and subsequent re-registration we would suggest that the process for amending an existing registration should be investigated as the most pragmatic solution. Can amendment be accommodated?	Registration details can be changed at any time. However, a registration event which involves change of ownership of a unit requires further consideration. The RAs are working with SEMIT to provide further detail. This information will not be available until 12th May.	At this moment in time, if a Unit changes Party, e.g. an Intermediary registers a Unit on behalf of a Generator Unit, then the Unit will have to be deregistered and reregistered. It will be assigned a new Participant ID. The provision of change of ownership of Units has been passed to the PRC / Mods Committee / Market Trial Working Group. Please note that this will need careful consideration within the context of Settlement Day settlement and Trading Day registration.
VPE	152	AP1, AP3	A question regarding market participants requirements for Digital Certs in accessing SMO systems over the type 2 channel. The particular concern is where the user works for a party that has registered as an intermediary. From my reading	Provided the RAs approve the Intermediary arrangements, all of the Trading Sites can be managed within one Participant Login, which would translate into one Digital Cert for each user within that	The Participant will require one Participant log on for all Generator Units (and relevant Trading Site Supplier Units) and another Participant log on for

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			of APs 1 and 3 the user will only require 2 digital certificates (whether using types 2 or 3 channels) to submit offers into the market and manage all financial transactions with the SMO on behalf of the parties for whom the intermediary is acting. Is this correct?	Participants user list.	all other Supplier Units. Each log on will have a separate digital certificate. Consequently, a Supplier-only participant taking on Generator Units as an Intermediary will require a further digital certificate.
ESB PMO	157	AP4 (V3.0) and Market Participant Update Document (V1.0)	<p>Participants submit Under Test Start and End Dates as part of their Technical Offer. For dates that a Unit is Under Test different Offer submission requirements and Settlement calculations apply. Hence both offer validation and settlement processes must hold a view of whether a Unit is Under Test on any given day. Conflicting test dates can be submitted as part of separate Technical Offers. We would like to understand how conflicting test dates are resolved by the central systems.</p> <p>How are conflicting Under Test dates resolved by the Central Systems? How do Participants cancel/revise Unit Under Test dates? Are Units Under Test on a Settlement Day or Trading Day basis? (e.g. if you submit a Start and End Date of 5 Nov 07 will you be Settled as Under Test from midnight to midnight or</p>	The SMO IT systems have now been specified to allow that all test data is completely overwritten when new test data is submitted. So any new test dates and characteristics of a previously submitted test will be erased by the new test data.	The Unit Under Test is effective on a Trading Day basis.

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			6am to 6am)		
Airtricity	168	AP2	Section 3.3 and the swimlane diagram in Section 8 of AP2 (Post Gate-Closure Revisions to ATC) clearly shows that a revision to ATC leads to a pro-rata revision to MIUNs. This is not consistent with the query response published to query 89. Can you clarify?	<p>if there is an ATC revision (reduction) then the MIUNs will be recalculated and the users will be scaled back. it will not fall into the error account.</p> <p>if there is a subsequent increase in the ATC after an earlier failure then the users can get scaled back up again under certain (limited) circumstances - essentially the MIUNs are limited to be same direction and less-than-or-equal-to-in-absolute-magnitude the original IUN values calculated by the MSP software. this means that if the IUNs were calculated on a reduced ATC immediately after gate closure, then they cannot subsequently be scaled up.</p>	No change
ESB PG	193	AP4	In the code it is necessary to designate a unit as being under test 5 working days in advance. What is the mechanism in the market for dealing with tests required in shorter time horizons e.g. 2-3 days. Also, how will statutory tests be covered - will these be at the discretion of the TSO in real time?		Remain open on the PRC list.

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
Airtricity	197	AP6	What format will the SMOW reports be provided in? Will the reports have fixed URL Addresses so that they can be downloaded automatically?		Details have been provided on the SMOW reporting formats through the BLG mailing list. Further details on the transport / naming conventions / updating will become available as they arrive.
NIE	212	AP9	<p>Agreed Procedure 9 Credit Risk Management (section 4.2 and procedural steps 4.2.2) refers to decrease, increase, warning and failure notices being sent to participants on each Working Day by 17:00.</p> <p>The Trading & Settlement Code (Baseline 13/1/07 and v1.2) Section H details the credit data transactions but does not include any reference to Credit Cover Notices. We cannot find any other reference to Credit Cover Notices within the documentation provided to date so are querying whether this is a Type 3 communication or not.</p> <p>Can you confirm the following: 1) How Credit Cover Notices will be</p>	<p>(1)Type 1 communication channel (by fax) will be used to send credit cover increase notices. With regard to the Credit Cover Decrease notices, this is no longer part of our design. The result of the credit cover requirements calculation will be communicated to participants. From this communication, it will be inferred to the participant if they have credit cover in place in excess of what is required. As this amount may fluctuate it is envisaged that participants may be happy to allow the excess credit cover to sit in the collateral account. However, the participant may withdraw</p>	<p>The go Active version of AP9 details withdrawing cash from the Collateral Account by the Participant in Section 3.3</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			<p>communicated on a daily basis (Type 3, Type 2 or Type 1)</p> <p>2) If Credit Cover Notices can be communicated via a Type 3 channel where in the SMO documentation (we have looked and cannot find any) can we find reference to these data transactions?</p>	<p>the excess if they so wish. No formal decrease notices will be issued.</p> <p>This is in line with v1.3 of the Trade and Settlement code and final version of AP 9 will support this.</p>	
NIE	213	AP1	<p>AP1 version 3.2 differs significantly from AP1 V3.0 in respect to the Error Supplier Unit – given that Global Aggregation will not be available at market start –</p> <p>1) does an error unit need registered (does in 3.2 does not in 3.0)?</p> <p>2) For the participant registering / affected by that unit, will the values against the error unit be zero with the demand allocated to the regular Supply Unit based on differencing?</p>	<p>The PES must register an ASU for Trading Site Demand which is explicitly aggregated by the appropriate MDP (MRSO or NIE T&D) for provision to the SMO for settlement. The existence of this ASU is taken into account in the Error Supplier Unit calculation so that there is no double counting of this demand.</p> <p>2) The PES will be required to register the Error Supplier Unit, the Error Supplier Unit will contain the summation of all residual demand in a jurisdiction, and will also contain any genuine errors in the aggregation of explicitly aggregated Supplier Units.</p>	No change

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
NIE	224	AP3	Can a MP sign up for Type 2 and type 3 communication channels and use both channels to download/submit data to/from the SMO (for example download the same reports from both channels)? Or If you sign up for the type 3 communications, you have to use this communication channel for all reports published via type 3?	Yes - You can use both channels.	No change
NIE	225	AP9 version 2.2a	The AP states that all credit cover notices (Decrease Notice, Warning Notice, Increase Notice, Failure Notice) will be sent via "Type 1 Channel". Can you confirm that this will be the communication method used for issuing credit cover notices following go-live in November?	Notices will be issued by fax, which is Type 1 communication	No change, except noting that a Decrease Notice no longer exists
	242	AP1	RE Query 70: not sure how Participants are expected to understand this from the market documentation. Would it be sensible to update the technical documents to avoid using the term Participant (perhaps they could refer to Account IDs)?		Agreed Procedure 1 now details the requirements to have more than one Participant.
ESBI	244	AP2, MPUD	Can I get clarification that the "Active Inconnector Unit Capacity Holdings" reports in AP2 are still been issued at the same time, and whether these will be documented in the next	AP2 has been modified now to represent the publication of Daily Interconnector Capacity Active Holdings for the same timeframe as set out in	As previously, noting that AP2 has the release of the Daily Interconnector Capacity Active

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			version of the MPUD?	Appendix K of the TSC (i.e. Day after Trading Day at 15:00). On a Member Private level, the Daily Interconnector Capacity Active Holdings will be made available to participants earlier (i.e. Daily, post gate closure and before Trading Day at 13:00). The monthly and annual interconnection auction results will not be published via the MPI. The two reports relating to the auction results have been removed. Further clarity will be provided within the next version of the MPUD when released if required.	Holdings now occurs earlier at 10:30. AP6 does not list this information.
NIE	273	AP11	The Agreed Procedure does not fully answer the question raised. On Type 1 communication the AP provides the definition: 'Manual Communication consists of a paper-based communications that are mailed or hand delivered to the Market Operator, as well as fax communications that will be tracked and audited by the Market Operator' However, it does not specify what information participants must specify	AP11 talks about authorisations for Type 1 communications, not only from a Participant but from authorised individuals within that Participant. Each authorised person has a password and their own signature. These are required on Type 1 communication for MO validation of the set of market-driven communications specified in AP11.	No change

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			<p>on a fax to ensure that the fax can be validated/authenticated by the MO as being from a participant.</p> <p>Could you please provide an answer to the last point.</p>		
ESB CS	280	AP15	<p>AP15 requires Total Invoice, Grand Total and Amount Due to be provided in the Invoice. Our systems are currently configured to receive these items. However, they are absent from the example files. Please indicate how these AP15 items map to the MPUD data items or confirm that they will not be provided?</p>	<p>AP-15 details the presentation format of the Invoice on the Website and not the content of the xml. The xml presentation is as described in the MPUD</p>	No change
NIE	288	Decision on Commercially Sensitive Data and AP6	<p>The decision paper on commercially sensitive data concluded that the MO will publish</p> <ul style="list-style-type: none"> – Half hour jurisdictional generator unit volumes – Half hour net Jurisdictional Import – Jurisdictional Error Supplier Units – Half Hour jurisdictional supplier-aggregate second-tier Supplier Unit volumes – PES wholesale-calculated Supplier Unit volumes <p>In what form of communication type and by what method will these be published?</p>	<p>The short answer is that SMO will not be publishing ANY commercially sensitive data. The long answer is that the communication type and method has not been decided yet and when they are, the whole market will be informed, probably through the BLG.</p> <p>The SMO is trying to determine, from Appendix K, how best to provide data that comes out of the ABB/SMO systems and at this stage it is thought that this it will probably provide all the T&SC's Appendix K obligations</p>	<p>Details have been provided on the SMOW reporting formats through the BLG mailing list. Further details on the transport / naming conventions / updating will become available as they arrive.</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
				through some secondary system to the web site.	
NIE	301	AP6 version 3.2a	Can you confirm that Market Operator Reports are only going to be published on working days as apposed to trading days?	The SMO will have an automatic data release, as per the T&SC's Appendix K data release schedule and the SEM IT systems are being built to deliver this.	No change
NIE	302	AP9 version 2.2a	Can you confirm what communication method will be used to provide Market participants with the daily credit cover calculation for Go Live?	The calculation is currently subject to a change request to ABB, for which we currently have no timetable/realistic/feasible implementation schedule (1st May)	<p>If the query relates to the algebra of the calculation, participants currently have the details in AP9 and the Code, some of which are currently subject to further clarifications in this PRC query log.</p> <p>If the query relates to the warning limits and trigger limits, Type 1 channels will be used.</p> <p>Certain variables used in the credit cover calculations are published under section 5.2 of AP6. There is no Code or AP requirement to publish daily</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
					reproductions of the credit cover calculations. If this is a requirement, then this will be raised via the Mods Committee for delivery.
ESB CS	307	AIP/SEM/07/120 – Decision on Commercially Sensitive Information	<p>The above paper was published and dealt with in particular the validation of PES wholesale demand volumes. The query is in relation to the status of reports that the paper requests the SMO to publish. Due to the critical nature of this validation for the PES please clarify or confirm the following questions as soon as possible:</p> <p>Half-hourly jurisdictional individual Generator Unit volumes; Is there a report in the MPUD which corresponds to these volumes and are they appropriately loss adjusted? What is the frequency and format of this report? Will it be available for Day 1 and over Type 3 channels?</p> <ul style="list-style-type: none"> • Half-hourly Net Inter-Jurisdictional Import; Confirmation received in MPUD v3.0 that this variable is NDLFJ, Net Inter-Jurisdictional Import loss adjusted and is received on the PIR. • The Jurisdictional Error Supplier Units; What exactly is intended to appear in this report? • Half-hourly jurisdictional supplier- 	<p>The CER paper on Commercially Sensitive Information was published and dealt with in particular the validation of PES wholesale demand volumes. The query is in relation to the status of reports that the paper requests the SMO to publish. Due to the critical nature of this validation for the PES please clarify or confirm the following questions as soon as possible:</p> <p>Half-hourly jurisdictional individual Generator Unit volumes; Is there a report in the MPUD which corresponds to these volumes and are they appropriately loss adjusted?</p> <p>Answer:</p> <p>There are several reports which apply to Generator Unit volumes – some public, some</p>	

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			<p>aggregate second-tier Supplier Unit volumes; Is there a report in the MPUD which corresponds to these volumes and are they appropriately loss adjusted? What is the frequency and format of this report? Will it be available for Day 1 and over Type 3 channels?</p> <ul style="list-style-type: none"> • The PES wholesale-calculated Supplier Unit volumes in both jurisdictions. Does this correspond to reports 44 and 56 in the MPUD, Daily Jurisdiction Error Supply? <p>Even though this paper has only been recently published it is appreciated that one piece of the error unit net demand loss adjusted calculation(PES volumes until global agg) is definitely available on reading of MPUDv3.0. Our systems have commenced testing phase and any information on the rest of the variables in the calculation would be much appreciated.</p>	<p>private. All give volumes by delivery hour and interval, and have the appropriate Transmission Loss Adjustment Factor (TLAF), as defined in the Code. These reports include the following:</p> <p>Publication / Data Report Name Class Timing Subscript Published via MO Website Published via MPI Confidentiality Validity</p> <p>Ex-Post Indicative Market Schedule Quantity G Day after Trading Day at 17:00 uh Y Y Public Data Valid only until Ex-Post Initial Market Schedule published on D+4</p>	

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
				<p>Ex-Post Initial Market Schedule Quantity G Four Days after Trading Day at 17:00 uh Y Y Public Data</p>	
				<p>Daily Indicative Ex-Post Market Schedule Summary G One day after Trading day by 16:00 Y Y Public Data</p>	
				<p>Daily Initial Ex-Post Market Schedule Summary G Four days after Trading Day by 16:00 Y Y Public Data</p>	
				<p>Ex-Post Indicative Market Schedule by Participant G Day after Trading Day at</p>	

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
				17:00 uh	
				Y Private Data Valid only until Ex-Post Initial Market Schedule published on D+4	
				Daily Indicative Ex-Post Market Schedule by Market Participant G One day after Trading day by 16:00	
				Y Private Data	
				Daily Initial Ex-Post Market Schedule by Market Participant G Four days after Trading Day by 16:00	
				Y Private Data	
				Daily Meter Data Detail D-1 (Price Effecting) G One day after Trading day by	

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
				17:00	
				Y Private Data	
				Daily Meter Data Detail D-3 (Price Effecting) G Three days after Trading day by 17:00	
				Y Private Data What is the frequency and format of this report? Will it be available for Day 1 and over Type 3 channels? Answer: The above reports will be updated daily post Trading Day, frequency/timing as indicated in the above table. All reports will be available over Type 3 communication channels. Half-hourly Net Inter- Jurisdictional Import; Confirmation received in MPUD v3.0 that this variable is NDLFJ, Net Inter-Jurisdictional Import loss adjusted and is received on the PIR. Answer: The Net Inter Jurisdictional Import (updated daily post Trading Day at	

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
				<p>15:00, and as updated) will be available on both the Market Operator (MO) Website and the Market Participant Interface.</p> <p>The Jurisdictional Error Supplier Units; What exactly is intended to appear in this report?</p> <p>Answer: There are two reports: The Indicative Daily Jurisdiction Error Supply (available one Working Day after Trading at 17:00) and the Initial Daily Jurisdiction Error Supply (available five Working Days after Trading at 12:00). Both are Private Data Reports, available on the Market Participant Interface (MPI). They are to include the following fields:</p> <ul style="list-style-type: none"> - TRADE DATE - JURISDICTION - DELIVERY DATE - DELIVERY HOUR - DELIVERY INTERVAL - JESU MW (Metered Data in MW for Jurisdictional Error Supply Unit) <p>****Please note that these reports are being reviewed internally, and will be updated in the next version of the MPUD)****</p>	

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
				<p>Half-hourly jurisdictional supplier-aggregate second-tier Supplier Unit volumes; Is there a report in the MPUD which corresponds to these volumes and are they appropriately loss adjusted? What is the frequency and format of this report? Will it be available for Day 1 and over Type 3 channels?</p> <p>Answer: Presently, there is no report in the MPUD which reflects this information. We will take this under review, and update as necessary in the next version of the MPUD.</p> <p>The PES wholesale-calculated Supplier Unit volumes in both jurisdictions. Does this correspond to reports 44 and 56 in the MPUD, Daily Jurisdiction Error Supply?</p> <p>Answer: Yes. ****Please note that these reports are being reviewed internally, and will be updated in the next version of the MPUD)****</p>	

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
ESB CS	328	Ap1 3.8 Data Processing Entity	This Query is a further clarification on Query 43 above. ESB CS will be a data processing entity(as per definition of AP1) and wishes to have tasks restricted to querying of technical and commercial offer data over Type 3(read only), downloading of settlement statements, invoices etc Type 3(read only) and viewing of registration data (read only. Can a data processing entity be restricted to those tasks above and be read only as indicated by above response to query? ESB CS does not wish to have ability on the data processing entity digital cert to submit bids and offers only query them, is this possible?	On this it is not clear what ESB CS are requesting. However I think what it appears they are trying to ask is not supported.... If I act for a party I can not let the other party only use some of the functionality of the Digital Certificate. I believe it is binary. Closed on May 31st by publication of the SEMIT paper External User Access to the SEM systems	No change
ESB PMO	335	AP4 (V3.0) and Market Participant Update Document (V1.0)	The following queries were previously raised relating to submission of Under Test Start and End Dates: How are conflicting Under Test dates resolved by the Central Systems? How do Participants cancel/revise Unit Under Test dates? Are Units Under Test on a Settlement Day or Trading Day basis? The following response was received: "The SMO IT systems have now been specified to allow that all test data is completely overwritten when new test data is submitted. So any	1. Units Under Test are treated as such for an entire Trading Day in the key elements of the Market Systems (e.g. MSP Software, Settlements). For the MSP Software, Units are scheduled on a Trading Day basis and inputs for Units Under Test may be different to a normal submission for their Settlement Class. For settlement (on a Calendar Day basis), the systems will only treat a Unit Under Test for the relevant Trading Periods that fall within the relevant	No change

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			<p>new test dates and characteristics of a previously submitted test will be erased by the new test data.”</p> <p>This response was helpful but raises the following questions:</p> <p>1. Are Units Under Test on a Settlement Day or Trading Day basis? (e.g. if you submit a Start and End Date of 5 Nov 07 will you be Settled as Under Test from midnight to midnight or 6am to 6am) - this part of the question was not addressed in the previous response.</p> <p>2: Is it correct to assume that the overwrite process for Under Test Start and End Dates only applies up to Gate Closure for a Trading Day? It seems that the process would have to work along these lines, otherwise when you send in Under Test Start and End Dates for a new test window it would prevent you receiving Testing Charges in the re-settlement process for previous test windows. e.g. you were under test 12 months ago - you send in new test dates for the week ahead. If the previously submitted test dates are erased for the test window 12 months ago you would no longer receive testing charges in the D+13M Re-Settlement Run.</p>	<p>Settlement Day. 2. Data for a specific Trading Day (including information on Units Under Test) is used by the Settlement functions and is stored for the relevant Trading Day. As per the previous response, the “registration” data is completely overwritten. However, data retrieved on the Trading Day is used by the Settlement system for any future Settlement run (e.g. TD+1, TD+4, M+4, M+13). Hence, the relevant Testing Charges will apply for a Unit which is Under Test for a given Trading Day, even if the “registration” information has been overwritten with a new period when the Unit is Under Test.</p>	

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
ESBIE	339	AP15 Invoicing	Participant received response from Query 187 above, regarding adjustment of SRA currency costs on Market Participant invoices. However, as the Trading & Settlement Code V1.3 states that SRAs will not be allowed between participants in different jurisdictions, will this cost still apply?	The calculations set out in AP-15, with regard to the impact of reallocations between different jurisdictions, was up to date with version 1.0 of the T&SC as available at that time. The Agreed Procedures are currently under review and are being updated to reflect version 1.3. The calculation set out will not be applied where there is no reallocation(s) between jurisdictions, in accordance with the provisions of T&SC v1.3	No change, noting that the SRAs are now allowed between jurisdictions. Therefore, to summarise the go-active position: currency costs will be accrued for cross-jurisdictional SRAs; currency costs will be not accrue for within-jurisdiction SRAs
ESB CS	340	Ap1 3.8 Data Processing Entity	Resubmission of Query 328 with more information included.	Closed on May 31st with the SEMIT paper External User Access to the SEM systems	No change
NIE	354	AP 11	AP11 states that Type 1 communication requires Name, Signature and Password. The first two seem sensible but the password does not fit with our policy on IT security. Can you please confirm that you do in fact require the users password for the authentication.	Historically, there have been some discussions / decisions around SMO security that did not permit things like email communication to be a secure/valid form of communication in the industry, which are now under review, with hopefully a more practical / flexible approach. Passwords as an additional type 1 Comms requirement seems a bit overkill and the	Email may be used for communications under the Code, effective from the time when they are received by the central market systems, but still need to be supported by fax. AP11 still required passwords on the Type 1 communications. Alternatives were

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
				<p>current thinking inside the SMO (by their new lawyer) is that at Market Registration there will be a submission of valid signatures by participants, for operational Comms and settlement disputes etc. etc. okay? When an actual decision is made, we will communicate it around the industry definitely.</p> <p>the new SMO lawyer has now clarified this and said this: A practical solution is being considered within the SMO whereby at Market Registration applicants will submit a list of authorized signatories with sample signatures for verification. These may be used as a verification tool for type one communications such as by fax. When a final decision is made, and the process fully worked, we will communicate it formally to the industry.</p>	<p>proposed during the AP consultation process. These were not deemed to be sufficiently superior to progress a change for go-active.</p>
Synergen	358	AP 4	If a participant updates bank account details using Type 2 or Type 3 interfaces is there any process to contact the participant and check the	At this stage, it is anticipated that the submitted information will be correct from participants. If a participant is	During the AP consultation process, this was raised as a matter of concern for

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			revised details or is the submitted information simply applied?	interested in reviewing what they have submitted, they should query the information during the timeframe within which it is effective and the response will contain the details.	participants. It was stated in the response to the consultation that this would be raised to the PRC query log, and raised the Market Trial Team and Modification Committee as an item of concern for participants.
NIE	362	AP15 – Invoicing	In section 3.3 page 16 to states that the indicative statement, initial statement and invoice will all be type 1 communication. Can you please confirm if this is correct?		Settlement Statements are provided over Type 2 and Type 3 channels. Invoices are available over all channel types, i.e. the Invoice is posted to participant.
Synergen	376	External User Access to the SEM systems - Digit.pdf & AP 1 Participant and Unit Registration and Deregistration	Following on from a phone conversation with the PRC concerning user types within the SMO systems I would like to know what functions within the Trading area the MO believes a user needs in order to perform settlement. The question arose from a description of the SMO central system user types: "Invoicing User – Access to the Settlements area (at a Read-Only level) Settlement Statements User – Access to both the Settlements area (at a Read-Only level) and the Trading system (at a Read-Write	For the purposes of the SMO's systems solution, "perform settlement" translates to users having read-only access to settlement statements and invoices. As settlement reallocation and submission of banking details will affect the settlement payments and/or charges, this is considered to be trading data and as such is located as part of the Trading module of the systems. So, from the SEM 'perform settlement' perspective,	No change

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			level)” Also AP 1 states “A Party, other than the Market Operator, may appoint a Data Processing Entity to submit Data Transactions, raise Data Queries and Settlement Queries and to view Settlement Statements”. In light of the levels of access to the functional areas of the MO systems can you confirm that a Data Processing Entity that is able to perform settlement for a participant cannot be restricted from submitting bid offers for that participant or querying submitted bid offer pre-gate closure?	participants can set-up users who will have read-only access to settlements. If submission of any data is required, then the user will need to have read-write access to the Trading module. If a participant allows this read-write access, the Data Processing Entity (DPE) will have access and the ability to submit Bid/Offer data, however the participant may be able to organise contractual arrangements which would preclude the DPE from ever doing this.	
NIE	377	AP 9 version 3 – 21 May 07 SEM Agreed Procedure 9 – Management of Credit Cover and Credit Default	Section 2.10 states When presenting a Letter Of Credit as part of their Credit Cover, the Participant must supply proof to the Market Operator that the Bank selected as the Credit Cover Provider meets the Banking Eligibility Requirements. Please clarify what “proof” is acceptable of the eligibility and how is this to be provided	The SMO lawyer indicated that the old-fashioned Letters of Credit (“LC”) are a piece of paper signed by the bank’s authorised signatory that the SMO would keep in a safe somewhere as it effectively becomes a cheque when required. However, these days banks often post electronic LCs. Further answer provided on June 5th Our internal advice is that this is all clearly specified in Section 6.162 and 6.163 of the TSC V2.0 with regard to eligibility	No change, other than to note that AP9 takes into account that LCs can be posted electronically.

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
				requirements for LoC.	
ESB CS	380	T&SC v2.0 Section 6 and AP 15 v3.0 Appendix 3	<p>1. Please confirm for ROI Supplier and NI Generator ROI energy blended VAT rate will be applied to ROI Supplier currency costs and NI energy blended VAT rate will be applied to NI generator currency costs and similarly for capacity currency costs</p> <p>2. What date will all the different VAT rates including blended rates for 2007 be published?</p> <p>3. Clarification is required on the application of VAT in the following credit cover calculations:</p> <ul style="list-style-type: none"> • $RCCSpr = \text{Max}\{0, ASEpf + UPESpg - \Sigma(SSREAaph + SSCRAaph) + VATpr\}$ and • $RCCGpr = \text{Max}\{0, ((AGEpf + UPEGpg - \Sigma(SSREAaph + SSRCAaph)) \times (-1)) + VATpr\}$ • VATpr is defined as the applicable VAT charge for the participant p in settlement risk period r • In the case of ASE and AGE please confirm this is the VAT amount charged on each charge item on the energy, capacity and MO invoices issued but not paid except for currency costs and SRAs; are VAT rates applied to the total charges on DAYCVvd , CCvh etc for settlement 		<p>1. Yes</p> <p>2. This will remain open</p> <p>3. 6.264 of the TSC specifies the VAT arrangements. The TSC does not specify VAT separately for ASE and AGE but they will be dealt with exactly the same as other components of VATable costs.</p> <p>SRAs are not subject to VAT.</p> <p>UPES and UPEG are subject to VAT in the same way as other components of VATable costs, however, the TSC does not deal with circumstances where the blended (or standard) VAT rates may change in the middle of a Historical</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			<p>day d to determine the VAT amount and if yes is it in accordance with the management of VAT rules now set out in AP 15v3.0 Appendix 3.</p> <ul style="list-style-type: none"> • Is the assumption that no VAT is applied to SRAs in the credit cover calculations correct? • For the New or Adjusted Participant are VAT rates applied to UPES and UPEG to determine the VAT amount and if yes is it in accordance with the management of VAT rules now set out in AP 15v3.0 Appendix 3. • For the standard participant are VAT rates applied to UPES and UPEG to determine the VAT amount and if yes is it in accordance with the management of VAT rules now set out in AP 15v3.0 Appendix 3 For e.g. $UPES_{pg} = BUPES_{pg} + CUPES_{pg}$ - for a supplier in ROI will the energy blended VAT rate be applied to $BUPES_{pg}$ to determine the VAT amount and the capacity blended VAT rate be applied to $CUPES_{pg}$ to determine that element of the $UPES_{pg}$ VAT amount? Which rate should be used if an Historical Assessment period or undefined exposure period spans a period where the blended VAT rates change? 		<p>Assessment Period. We would suggest that an interested participant raise a Modification Proposal (probably in relation to the AP) after go-live since only Urgent Modification Proposals may be raised before go-live.</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
ESB PMO	388	Dummy Generator Parameter Submission	<p>Clarification of the conventions for submitting Technical Offers (Generator Parameters) is requested. The MPUD v3.0 section A.2.5 defines a set of Generator Parameters which make up the registration elements of the Unit Technical Offer. Participants provide this information manually during the Unit registration process. Following initial registration, Participants can update the data by submitting a revised set of Generator Parameters using the automated registration interface.</p> <p>Several of the Generator Parameters defined in the MPUD V3.0 are only relevant to certain Units. For example:</p> <ul style="list-style-type: none"> - Maximum Reservoir Capacity and similar parameters are only relevant for Pumped Storage Units; - Not all Units have Soak Times and Trigger Points; - Many of the data items do not exist for Price Taker Units; - Some values do not actually relate to Generator Units (e.g. Max_Ramp_Up and Down which relate to Demand Side Units; - Some values are not used in the SEM for any Unit. <p>However, both the MPUD v3.0 and mpr-all_PMO.xsd require the majority of Generator Parameter fields to be</p>		The previous response to this query was that clarity would be provided during market trial. Queries 40 and 63 relate.

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			<p>populated in each submission. The XML file will be deemed invalid if a mandatory data item is not populated, even if it is not used for the relevant Unit. Since the mandatory values are required to generate a valid submission but may not exist for a particular Unit, Participants must populate fields with dummy values.</p> <p>The TSC and MO documentation does not specify which values can be populated with dummy values. It is also unclear what dummy values should be used. We understand that zeros can be used in some cases but are unclear whether this approach can be used in all circumstances. We are concerned that populating the dummy values incorrectly may have an unintended impact on the scheduling and/or settlement of Units.</p> <p>NB: the rules mandating which values must be populated in the Generator Parameters defined by the mpr-all.xsd do not match those in the registration spreadsheets issued to Participants.</p> <p>Therefore, we request guidance on the following:</p> <ol style="list-style-type: none">1. Please confirm which data items will be mandatory in a Generator Parameter submission?2. For mandatory Generator		

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			<p>Parameters, please indicate at a Unit Type / Data Item level which Generator Parameters can be populated with dummy values without affecting the scheduling and Settlement of a Unit?</p> <p>3. Where dummy values can be provided, please indicate at a Unit Type / Data Item level suitable values to pad out the Generator Parameter XML file?</p> <p>Our working assumptions are included in the attached spreadsheet; it would be helpful if these could be validated. In the long term some guidance in this area in either AP4 or the MPUD may be appropriate. We are seeking to automate the population of dummy values within our systems and require clarification as soon as possible to support preparation for market trials.</p>		
ESB CS	392	Registration and Banking Details in MPR	<p>During MPR SMO training on 7th June an issue came to light when reviewing/updating bank details through the Financials section of the MPR. There is no separation of user access required between the Facilities and Financials section. This means essentially that a trader updating resource details which corresponds to a technical offer could also change banking details.</p>	<p>For access within the area of SEM registration, Participant users have 'write access' they have access to all fields, however any changes made within this area remain in a state of 'pending' so that they can be validated and confirmed by the SMO before the changes are officially confirmed on the SEM systems. Stringent business</p>	<p>This issue was raised by respondents to the Agreed Procedure consultation. The response to query #358 relates, and has set the current position that such security should be performed on the Participant side to manage access to the digital certificate</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			ESBCS request that that changing bank account details should only be via Type 1 i.e. a formal letter from ESB headed paper signed by an approved manager	<p>processes will be in place to ensure that such changes are verified by the SMO, therefore ensuring that 'write access' does not result in immediate data changes to the system.</p> <p>In relation to changes to Participant bank account details, this area will also be covered by well-defined SMO business processes, primarily to ensure that all data is checked for accuracy/compliance both within the SMO and with the relevant participants.</p>	<p>appropriately.</p> <p>This has been notified to the Mods Committee as a potential future change request from participants.</p>
ESB CS	393	AP10	<p>Can you confirm that the timelines are D-29 to D+4 as set out in AP10 version 3.0 please? (page 7)</p> <p>There has been some confusion created following the MO systems training last week. (It was stated that the timeline may be D-1).</p>	<p>The answer is that Yes, we can confirm that the timelines in AP10v3.0 are still correct and all the central IT systems and supporting business processes are being designed to ensure that the SMO achieves this, consistently. The system training you referred to will be reviewed for consistency and changed if necessary, for clarity</p>	No change

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
ESB PG	400	AP4	<p>After using the system during the training course a number of things came up which are not in any documentation. They will impact the way our system works and change requests will be required if this is the case. Changes will also be required to AP4 to reflect this functionality if this is confirmed:</p> <p>Standing Offers</p> <ul style="list-style-type: none"> • Only one Standing offer Day type 'All' can exist in the MO system. To ensure functionality works, submission of this type of offer is restricted so you can only submit a Standing offer Day type 'All' with an effective date 30 days in the future. • A standing offer day type 'All' must submit 25 hours worth of availability, min output and min load data every time it is submitted <p>These need to be confirmed by the MO and if true need to be reflected in AP4</p>	<p>For each resource in the system (MPR) there can exist several standing offers. (There must be one standing of type ALL and then optionally there can be standing of Day Types for all days i.e. there must exist 1 of type ALL and then there can exist from 0 to 7 Day Types.) Standing offers form commercial offer data (CoD) and are therefore submitted via the MPI i.e. Trading.</p> <p>The Market Rules specify that there must be a Default Offer for each resource. In order to implement this Default Offer our system uses a Standing Offer of Type ALL. Therefore, at the time of a new resource registration (done in MPR) the Market Operator (MO) must ensure that a corresponding Standing Offer of Type ALL is also submitted for that resource (done in the MPI).</p> <p>As standing offers are used/consumed at the time of Market Opening (i.e. Standing Bid Conversion) the effective date of any standing offer must be at soonest the next Trade Date to be Opened! The Trade</p>	<p>This issue was raised during the AP consultation. The answer provided to date is described as a "holding answer". Until this holding answer is formally confirmed, it was not included in AP4.</p> <p>This has been notified to the Mods Committee as a potential future change request from participants following full clarification.</p> <p>Remains open</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
				<p>Date field of any standing offer specifies that Trade Date from which the standing offer should be used i.e. the soonest this date can be (at any given point in time) is the Trade Date that is to be opened next.</p>	
				<p>E.g. Today = 13-June-2007. This morning at 06:00 D+29 was opened i.e. 13+29=42 less 30 days in June means that 12-July-2007 was opened this morning. When 12-July was opened standing bids were converted. Therefore, if submitted a new standing offer (or updating and existing standing offer) the soonest Trade Date that can be used is 13-July.</p>	
				<p>As stated above, for each resource a standing of type ALL is required and inputted at the time the facility is registered (in MPR). The effective date of the new facility (in MPR) must match the effective date of the standing of type ALL (in MPI). Updates to the standing of type ALL is permitted by the MPs. When the MPs are updating existing standing of</p>	

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
				<p>type ALL they must use the next Trade Date to be opened as the effective date and they cannot specify an expiry date. This ensures that no gaps are introduced into the default data.</p>	
				<p>The MPs can optionally also submit standing offers of Day Types. In this instance during Market Opening and standing bid conversion standing of type ALL is converted first. Then, if an appropriate standing of Day Type exists, then it is converted. In this way the Day Type takes preference over the ALL. When submitting/updating standing of Day Types the MPs must specify the effective date to be AT LEAST the next Trade Day to be opened. It can be this Trade Day or greater. In addition, the MP is permitted to optionally specify and expiry date for standing of Day Type.</p>	
				<p>When submitting/updating a standing of type ALL the system forces the MP to submit all 50 trading periods - this is required to cover long days.</p>	

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
				When submitting/updating a standing of type DAY TYPES the system allows the MP to submit either 48 / 50 trading periods. There may be occasions where only 48 trading periods are specified and a long day is being opened. In this instance the standing of Day Type will fail but the Standing of ALL would have already been converted.	
Viridian Group	404	MPUD v3.0, AP6	The reports listed in AP6 do not match with the reports listed in MPUD v3.0. Which is correct ?	Both AP6 and the MPUD are currently being rewritten/aligned by various teams. It is our expectation that this will take another two or three weeks and then be approved before being distributed to through the normal communications channels.	Agreed Procedure 6 and the MPUD have passed through joint change control panel. Any remaining discrepancy of the central market systems (MPUD) with the Code will need a formal Code Modification to change.
ESB PG	406	AP4	After using the system during the training course a number of things came up which are not in any documentation. They will impact they way our system works and change requests will be required if this is the case. Changes will also be required to AP4 to reflect this functionality if		This issue was raised during the AP consultation. This has been notified to the Mods Committee as a potential future change

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			<p>his is confirmed:</p> <p>Technical Offers Does the ABB system store more than one Technical Offer for each unit? Is it true that you can only ever see the latest submitted Technical Offer for a unit in the MO systems? When you query technical offer you will also receive back the latest submitted? If a user submits a Technical Offer and before the offer is approved, submits another Technical offer, how can the user track the status of the first offer submitted?</p> <p>How can a MP see what was effective at gate closure if a Technical Offer is submitted with a later effective date?</p>		<p>request from participants following full clarification as <u>if</u> the understanding in the query is correct, it is contrary to 3.28 of the Code.</p> <p>Remains open</p>
Viridian Group	408	AP 3 – Digital certificates	<p>1. What is the process when digital certificates expire ? Are they automatically re-issued or do participants have to re-apply</p> <p>2. Do all certificates expire on the same date or is the validity for a fixed period from the date of issue ?</p>	<p>1. The Digital Certificates, obtained through VeriSign, can be valid for up to a 2 year period. At this time, the SMO has yet to determine what the default period will be (most likely not less than 1 year). We have agreed to try to confirm the default period. Before the expiry, the users will be advised by email that their digitals certificates are to expire, and it will be up to them</p>	No change

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
				to respond accordingly.	
				2. The validity for the digital certificates will be a fixed period from the date of issue.	
NIE	419	AP6	Can you please advise if the SMO will publish a report a number of times i.e. if a issue with a report is found and the report is re-issued. If yes, will the report have the same filename etc..		AP6 currently states that the report will not be reversioned for csv settlement reports. The MPUD xml reports are versioned according to the MPUD. No detail is available on the SMO website reports naming convention at this time.
ESBI	424	MPUD/ AP10 / AP15	The eligibility of an SRA is published through the Settlement Reallocation Report which is included in the MPUD under Settlement Reports. The MPUD though isn't clear on the timelines associated with this report. Are these SRA reports published using the same frequency as other Settlement Reports (Eg PIR) on a daily basis during the invoicing timeline, i.e. SD+1 to SD+4?		Remains open Remains open

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
ESB CS	429	AP15	<p>In AP15 Settlement and Invoicing, it says that the pool invoice for energy will not split out the ROI and NI energy purchases, but that the split will be available on the SMO website. However, at the AIME settlement training on 15th June, it was stated that this was not final and that there was a possibility that the ROI and NI amounts would be explicitly set out on the invoice.</p> <p>Can you confirm whether the separate amounts will be provided on the invoice please - This would be the preference of ESB Customer Supply</p>		Still open
ESBI	446	AP13	<p>Can you please clarify that if a Participant (Participant A) faxes a query to the MO on behalf of another Participant (Participant B) where the fax reply is sent to?</p> <p>This could be either the fax number which sent the query in (Participant A fax machine) or the fax number registered to the participant lodging the query (Participant B fax machine).</p>		The fax will be acknowledged to the "sending" Participant A. Note that Participant B will be an affected party and will receive details of the query.

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
ESB IE	449	AP17	AP 17 indicates that the form/mandate to set up a Collateral Reserve Account will be available from the MO website. Can you indicate where on website this can be obtained		Still open
ESB CS	450	AP9 v3.2 and AP153.2 and AP15 v3.0,	<p>1. Note issued on 29th June advises participants to build their systems on the basis of the AP9 approach to the calculation of the Actual Exposure for the determination of the Required Credit Cover for each Participant. However T&SC v2.0 does not explicitly refer to the VAT calculations to be used in required credit cover or that Resettlement exposure is captured in fixed credit cover. AP9 addresses these areas of required credit cover in Section 2.3(Resettlement Exposure) and Appendix 2(Calculation of VAT in Required Credit Cover. Please confirm that this approach should also be used by participants when building their systems.</p> <p>2. Appendix 3, AP15 v3.0 refers to "As the Trading Payments and Trading Charges are settled separately from Capacity Payments and Capacity Charges there will be separate Blended Rates for each (i.e. there will be a Blended Rate for Capacity Payments and Capacity Charges and a Blended Rate for Trading Payments and Trading</p>		<p>AP 9 states that Actual Exposure is based upon invoiced amounts and therefore includes currency costs. The TSC does not include currency costs in the calculation of Actual Exposure. On 29 June a note was published on the AIP website identifying the discrepancy between the TSC and AP9 and advising participants to develop their systems on the basis of the AP9 approach.</p> <p>2. There is only one blended VAT rate utilised in the central market systems</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			Charges)” This has been removed from AP15 v3.2. For suppliers in ROI and generators in NI what VAT rate is being used for capacity payments and charges? If a blended rate is being used for capacity payments and charges will an average VAT rate be used in Undefined Potential Exposure in required credit cover calculations?		
Viridian Group	451	AP6	For how long will reports be available for request from the SMO site. Ie how far back in the past can we query a daily report ?		Agreed Procedure 6 states that “When a report of the same name as set out in Appendix E is updated, and the information contained within those reports is generated by Market Operators Isolated Market System, the previously Published report of the same name will be overwritten by the new Publication.” Therefore, the reports will be updated on the schedule for the updating of those reports, or when the report is updated or corrected.

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
NIE Supply	453	AP1 / AP4	Can you please advise what the turn around time will be for the SMO approving registration amendments that have been requested by the Market Participant?		The limitations on the approval times are described in AP4, Table 2. A parallel issue of the nature of any validation was raised during the responses to the AP consultation.
ESB CS	454	AP9 v3.2, RA note issued on currency	Per Section 6 of the code the calculations for each supplier units and generator units are defined separately before rolling up to a participant level. The note issued on 29th July refers to currency costs included in the invoice amounts. In the case of Trading Site Supplier units charges applicable to these units form part of the supplier exposure calculations in the T&SC. How does the SMO system treat TSSU charges in relation to invoiced amounts, uninvoiced settlement statements and undefined potential exposure– are these charges contained within the required credit cover calculations for supplier units or generator units? In relation to the portion of currency costs which could be attributed to a TSSU in the generator invoice do these costs remain as part of the required credit cover calculations for generator		Remains open

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			units?		
NIE Supply	460	AP2 / AP6 / MPUD	<p>There is a discrepancy across the different documents relating to the ATC reports published for the Interconnector. We need clarification on these issues:</p> <ol style="list-style-type: none"> 1. Is there still a report for Daily Revised Interconnector ATC Data published 4 days after the Trading day? 2. If we no longer get this report, is the Interconnector Available Capacities report now referred to as the Daily Revised Interconnector ATC Data published by 15:00 on TD+1? 3. If this is not the case, Why does the MPUD not show the Interconnector Available Transfer Capacities report published TD+1 at 15:00? <p>In AP6 that was published 21 May 2007 it stated that there are 3 reports:</p> <p>Daily Interconnector ATC - TD-2 by 10:00 Interconnector Available Transfer Capacities - TD+1 at 15:00 Daily Revised Interconnector ATC Data - TD+4 at 16:00</p>		<p>The Code speaks of publication on the Market Operator website. Therefore Section 5.2 should align with Appendix E. Details of what reports are available over the MPI / MPR are detailed in AP6. Contractually, these reports do not need to be aligned to the MPUD. If the MPUD contains further reports, this does not need to be reflected in AP6. If the MPUD does not contain the reports in AP6 however, the Market Operator could be considered not to be truly making these reports available to participants as set out contractually in AP6.</p> <p>The later version of AP6 contains the reports which must be</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			<p>In AP6 published 25 June 2007 is states the reports are:</p> <p>Daily Interconnector ATC - TD-2 by 10:00 Interconnector Available Transfer Capacities - TD+1 at 15:00</p> <p>MPUD version 3.0 does contain a revised report:</p> <p>Report 16 Daily Interconnector ATC - TD-2 by 10:00 Report 58 Daily Revised Interconnector ATC Data [no expected date / time of receipt was published]</p> <p>The SMO Website Publications list has 2 reports:</p> <p>Available Transfer Capacity - TD-2 by 10:00 Interconnector Available Transfer Capacities - TD+1 at 15:00</p>		<p>contractually delivered. The D+4 Daily Revised Interconnector ATC Data is no longer required to be delivered. There is no known circumstance when ATC will change between D+1 and D+4.</p> <p>Other queries relating to the information in the MPUD, and reports contained in MPUD not required by the Code are left open.</p>
NIE	468	AP2 / AP6 / MPUD	<p>We need clarification on the report - Daily Aggregated Interconnector User Nomination</p> <p>MPUD version 3.0 states this is available as report 45 published on TD+1 by 14:00. The release regarding MPUD version 4.0 did not have this listed as 1 of the reports</p>		<p>The Code speaks of publication on the Market Operator website. Therefore Section 5.2 should align with Appendix E. Details of what reports are available over the MPI / MPR are</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			<p>being removed.</p> <p>The following documentation does not have this report listed:</p> <p>AP6 (25 June 2007) Appendix E TSC version 2.0 SMO website publications list</p> <p>Please confirm whether or not we receive this report?</p>		<p>detailed in AP6. Contractually, these reports do not need to be aligned to the MPUD. If the MPUD contains further reports, this does not need to be reflected in AP6. If the MPUD does not contain the reports in AP6 however, the Market Operator could be considered not to be truly making these reports available to participants as set out contractually in AP6.</p> <p>Queries relating to reports contained in MPUD not required by the Code are left open.</p>
NIE	469	AP2 / AP6 / MPUD	<p>We need clarification on the report - Daily Interconnector Net Actual</p> <p>MPUD version 3.0 has this as report 42 published TD+1 at 16:00</p> <p>None of the following documentation references this report: SMO Website Publications list Appendix E - TSC version 2.0 AP6 (25 June 2007) - It was listed in the previous version of AP6</p>		<p>The Code speaks of publication on the Market Operator website. Therefore Section 5.2 should align with Appendix E. Details of what reports are available over the MPI / MPR are detailed in AP6. Contractually, these reports do not need to</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			<p>The release regarding MPUD version 4.0 did not have this listed as one of the reports being removed.</p> <p>Please confirm if this report has been removed or if it is just missing from the other updated documents</p>		<p>be aligned to the MPUD. If the MPUD contains further reports, this does not need to be reflected in AP6. If the MPUD does not contain the reports in AP6 however, the Market Operator could be considered not to be truly making these reports available to participants as set out contractually in AP6.</p> <p>The later version of AP6 contains the reports which must be contractually delivered.</p> <p>Queries relating to reports contained in MPUD not required by the Code are left open.</p>
NIE	470	AP2 / AP6 / MPUD	<p>We need clarification on the report - "Revised Modified Interconnector User Nominations"</p> <p>AP6 (25 June 2007) states this report is published on D-1 at 16:00 and updated as available via the MPI.</p> <p>This report is not featured in other any documentation including MPUD</p>		<p>The Code speaks of publication on the Market Operator website. Therefore Section 5.2 should align with Appendix E. Details of what reports are available over the MPI / MPR are detailed in AP6.</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			<p>version 3.0</p> <p>There is a similar report in AP6 and MPUD 3 - Daily Revised Interconnector Modified Nominations published TD+1 by 16:00 and updated as available</p> <p>Please confirm if we do receive the first report aswell and if it will be featured in MPUD version 4.0. Please clarify the difference between the 2 reports?</p>		<p>Contractually, these reports do not need to be aligned to the MPUD. If the MPUD contains further reports, this does not need to be reflected in AP6. If the MPUD does not contain the reports in AP6 however, the Market Operator could be considered not to be truly making these reports available to participants as set out contractually in AP6.</p> <p>Queries relating to reports contained only in MPUD not required by the Code are left open. Nonetheless, the Regulatory Authorities are not aware of the difference between these reports, and believe at this time that "Revised Modified Interconnector User Nominations", publication class "1" in Section 5.3 is an erroneous duplicate of "Daily Revised</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
					Interconnector Modified Nominations”
NIE	471	AP2 / AP6 / MPUD	<p>Can we get clarification on when this report will be available on the MO website - "SO Interconnector Trades"</p> <p>AP6 (25 June 2007) states it will be TD+1 by 16:00</p> <p>SMO Website Publications List does not give a time - this is the only report without one</p>		The SO Interconnector Trades must be published by the time specified in AP6 – otherwise a Code Modification is required.
NIE	472	AP2 / AP6 / MPUD	<p>AP6 (25 June 2007) has a report "Interconnector Flows" being published daily, post gate closure and before trading day by 16:00 via the MPI (public data)</p> <p>MPUD version 3.0 does not have this report listed and it is not featured in Appendix E (TSC version 2.0).</p> <p>Can you please confirm that the report is available and how we receive it. Will it be featured as a report in MPUD version 4.0?</p>		The Code speaks of publication on the Market Operator website. Therefore Section 5.2 should align with Appendix E. Details of what reports are available over the MPI / MPR are detailed in AP6. Contractually, these reports do not need to be aligned to the MPUD. If the MPUD contains further reports, this does not need to be reflected in AP6. If the MPUD does not contain the reports in AP6 however, the Market

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
					Operator could be considered not to be truly making these reports available to participants as set out contractually in AP6.
					Queries relating to reports contained only in MPUD not required by the Code are left open.
NIE	473	AP2 / AP6 / MPUD	<p>AP6 (25 June 2007) has this report listed twice as being available through the MPI:</p> <ol style="list-style-type: none"> 1. Published D-1 at 11:00, updated as available 2. Daily, post gate closure and before trading day by 11:00 <p>There is also a report in AP6 "Daily Ex-Ante Interconnector Nominations" available TD+1 at 11:00. This is the same as MPUD version 3.0</p> <p>MPUD version 3.0 has not listing for the report "Ex-Ante Interconnector User Nominations"</p> <p>Neither report is listed in Appendix E of TSC version 2.0.</p> <p>Please confirm if these reports are the same or when the first is</p>		<p>The Code speaks of publication on the Market Operator website. Therefore Section 5.2 should align with Appendix E. Details of what reports are available over the MPI / MPR are detailed in AP6. Contractually, these reports do not need to be aligned to the MPUD. If the MPUD contains further reports, this does not need to be reflected in AP6. If the MPUD does not contain the reports in AP6 however, the Market Operator could be considered not to be</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			received.		truly making these reports available to participants as set out contractually in AP6. All of these reports are MPI/MPR report. Queries relating to MPI/MPR reports contained in AP6 but not detailed in the MPUD.
NIE	474	AP2 / AP6 / MPUD	<p>MPUD version 3 has report 49 - Daily Interconnector Modified Nominations being published TD+1 at 12:00.</p> <p>The SMO website publications list states the Modified Interconnector Unit Nominations report will be published TD+1 at 15:00</p> <p>Appendix E (TSC version 2.0) agrees with the SMO list - Modified Interconnector Unit Nominations TD+1 by 15:00</p> <p>AP6 (25 June 07) has 3 different reports being published:</p> <ol style="list-style-type: none"> 1. Modified Interconnector Unit Nominations TD+1 by 15:00 2. Modified Interconnector USER Nominations - Daily, post gate closure and before trading day by 		<ol style="list-style-type: none"> 1. Modified Interconnector Unit Nominations contain the nominations for all Users. Modified Interconnector User Nominations contain only the Units for that individual User. 2. There is a typo in AP6 for the third report of class "G" in Section 5.3. The following reports are received: <ul style="list-style-type: none"> • "E" Modified Interconnector User Nominations at 12:00 post gate closure, privately over

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			<p>12:00 [PRIVATE DATA] 3. Modified Interconnector USER Nominations - D-1 at 13:00 [PRIVATE DATA]</p> <p>Please clarify:</p> <ol style="list-style-type: none"> 1. What is the difference between user and unit nominations for the Interconnector? 2. What reports do we receive on Modified Nominations and when? 		<p>MPI</p> <ul style="list-style-type: none"> • “G” Modified Interconnector User Nominations at 13:00 D+1, privately over MPI (the typo is here, D-1 should be D+1) • Modified Interconnector Unit Nominations <p>These changes, along with specific definition of these reports will be brought to the Modification Committee’s attention.</p>
NIE	475	AP2 / AP6 / MPUD	<p>We need clarification on the report - Indicative Interconnector Flows and Residual Capacity.</p> <p>AP6 (25 June 07) and the SMO Website publications list both have this report listed as being available TD+1 by 16:00</p> <p>MPUD version 3.0 has this as report 60, being available TD+1 at 14:00</p>		<p>The Indicative Interconnector Flows and Residual Capacity reports must be published by the time specified in AP6 – otherwise a Code Modification is required.</p>

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			Appendix E of TSC version 2.0 does not list this report		
			Can you please confirm when we receive this report?		
NIE	476	AP2 / AP6 / MPUD	Different documentation has different dates and times for this report being published.		This reports must be published by the time specified in AP6 – otherwise a Code Modification is required.
			MPUD version 3.0 has this as report 61, published daily on TD+3 at 14:00		
			AP6 (25 June 2007) states it is available TD+5 by 16:00		
			SMO Website publications list also has it as TD+5 by 16:00		
			Appendix E of TSC version 2.0 does not list this report		
			Please confirm when we receive this report		
NIE	477	AP2 / AP6 / MPUD	Daily Interconnector Capacity Active Holdings report in Appendix E of TSC version 3.0 is posted on TD+1 by 15:00 - this is the same as AP6 published 25 June 2007		The published report is received via the SEM Website ex post as per Appendix E and AP6.
			MPUD version 3.0 has report 54 Daily Interconnector Capacity Active Holdings as being posted TD-1 by 13:00.		The MPUD may be providing an extra report, containing just the information for individual participants, on TD-1. Queries

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			Can you please clarify which one of these is correct, whether it is received ex-post or ex-ante?		relating to reports contained only in MPUD not required by the Code are left open.
NIE	478	AP2 / AP6 / MPUD	MPUD version 3 contains a report 55 - Daily Interconnector Capacity Holdings. This has been removed from the new AP6 and from Appendix E of the TSC. However the document released today relating to the release of MPUD version 4 did not have this report listed in the removed reports on the last page.		Queries relating to reports contained only in MPUD not required by the Code are left open.
			Can you please confirm whether we get this report or not. If we do get it when is it published?		
NIE	479	AP2 / AP6 / MPUD	There is a discrepancy across the different documents relating to the ATC reports published for the Interconnector. We need clarification on these issues: 1. Is there still a report for Daily Revised Interconnector ATC Data published 4 days after the Trading day? 2. If we no longer get this report, is the Interconnector Available Capacities report now referred to as the Daily Revised Interconnector ATC Data published by 15:00 on TD+1? 3. If this is not the case, Why does the MPUD not show the Interconnector Available Transfer		Repeat of Query 460

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			Capacities report published TD+1 at 15:00?		
			In AP6 that was published 21 May 2007 it stated that there are 3 reports:		
			Daily Interconnector ATC - TD-2 by 10:00 Interconnector Available Transfer Capacities - TD+1 at 15:00 Daily Revised Interconnector ATC Data - TD+4 at 16:00		
			In AP6 published 25 June 2007 is states the reports are:		
			Daily Interconnector ATC - TD-2 by 10:00 Interconnector Available Transfer Capacities - TD+1 at 15:00		
			MPUD version 3.0 does contain a revised report:		
			Report 16 Daily Interconnector ATC - TD-2 by 10:00 Report 58 Daily Revised Interconnector ATC Data [no expected date / time of receipt was published]		
			The SMO Website Publications list has 2 reports:		

Respondent	Ref.	AP	Comment	Old Response	New Response and Action
			Available Transfer Capacity - TD-2 by 10:00 Interconnector Available Transfer Capacities - TD+1 at 15:00		

4. Summary of Actions Arising

This section contains each action arising from the responses to consultation, and from the PRC query log. There are three types of action:

- Raise a new query to the PRC arising from a consultation comment. Where the response to the consultation is already covered by an existing query the linkage between consultation comment and PRC query is sound, but the query is not re-raised.
- Raise potential issues that may affect market trial to the attention of the market trial working group (MTWG).
- Raise known or future likely issues that may impact market documentation between now and go-live to the secretariat of the Modifications Committee, and therefore also the Market Operator.

These actions are not mutually exclusive. The Regulatory Authorities do not intend to raise change requests against any of these items. This list only contains potential changes identified through participant comments. Further items may be raised to the Modifications Committee by the Regulatory Authorities for its members' attention. Raising of these issues to the MTWG or the Modification Committee does not imply that that these will be actioned by the Market Operator as Urgent. If actioned by a Modification Committee Member and raised as a Modification Proposal prior to SEM go-live, this does not imply that the Modification Proposal will be deemed as Urgent. The criteria for Urgent Modifications are defined in paragraph 8.52 of the Code.

Consultation responses are prefixed with a C. PRC queries are prefixed with a P.

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
C4	✓	Synergen (low) Can the Participant IDs be			✓	Synergen (low) (AP1) Can the Participant IDs

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
		changed into more meaningful names rather than the alphanumeric convention currently employed?				be changed into more meaningful names rather than the alphanumeric convention currently employed
C6	✓	Synergen (low) Will participants be allowed to pay the Accession Fee via either cheque or electronic transfer?	✓	Some participants may wish to pay their accession fees by cheque; the AP doesn't allow this at this time, but they still look for the facility	✓	Synergen (low) (AP1) Revise the step in the AP to give parties freedom to pay the Accession Fee via either cheque or electronic transfer.
C21, C22, C37, C40, C126, C127, C209	✓	Synergen/ESB (high) (Related to existing query 358, 392) Can the existing user types, authorization categories, and functional areas be amended to split the "registration" area and user to include a "Banking Contact"? Alternatively, a business process, potentially documented in AP4, needs to be set out setting a higher level of validation.	✓	If there are trial "banking events" during scripted phase of market trial, the alteration of the market trial participant banking arrangements may come under discussion	✓	Synergen/ESB (High) (AP1/AP4/AP11/AP17) Depending on the outcome of query 358, or the request to create new functional areas, authorization types, and users with banking-only access, to change AP1 so that the banking details have a different method of authorization when changing
C33, C38, C42, C43, C236, C237, P453	✓	ESB (Medium) What specifically are the validation rules performed on submitted data in Agreed Procedure 4; in particular some of the validation rules in the	✓	There are still outstanding queries on the validation rules for submitted Offer data. This will likely have to be clarified during registration / market trial operation.	✓	ESB (Medium) (AP4) The following tables in Appendix 2 of Agreed Procedure 4 will need to be altered in Comment column, as this appears to contain

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
		<p>appendices need explanation as they do not make intuitive sense. Can it be confirmed that there are no validation rules or business process limitations which will prevent a participant updating all elements of Technical Offer Data (as defined in the Code) prior to gate closure, effective for the next Trading Day. This latter concern question arises from the statement in 2.4.3 of AP4 “It is not anticipated that Registration Default TOD will change on a regular basis and is considered similar to static data.”</p>				a set of validation rules
C34, C35, C36, C238	✓	<p>ESB (Medium) The following issues have been noted with some of the items in the Unit Resource table in Appendix 2 of Agreed Procedure 4: a) Definition of “Minimum Time Sync Warm” and “Minimum Time Sync Hot” appear incorrect. b) “Number of Hours elapsed for Cold Sync time” – comment states that this</p>			✓	<p>ESB (Medium) (AP4) There is likely to be a series of AP4 changes arising from a review of the MPUD-generated tables in AP4</p>

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
		<p>is not utilised in the systems and can be left as Null in the Data Transaction – however the data is mandatory</p> <p>c) Definition of “Soak Times” appears to be different from that used in the Trading and Settlement Code. Soak Times refer to holding times during unit startups.</p> <p>d) the definition of “Soak Time Hot 1” comment states “Time below Minimum Stable Generation for which a Unit remains at a constant MW level whilst in a hot state before continuing to increase or decrease output”; In Trading and Settlement Code , Soak Time Hot is defined as “Means for each Soak Time Trigger Hot, Soak Time Hot must remain at that Soak Time Trigger Point Hot during a Hot Start”</p> <p>e) “Target Reservoir Level Percentage” appears in Unit (Resource) table but also appears in Generator Offer Data table. Surely</p>				

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
		this should only appear in Generator Offer table? f) Target Reservoir Level MWH" appears in Unit (Resource) table but also appears in Generator Offer Data table. Surely this should only appear in Generator Offer table?				
C36, P7, P40, P63	✓	ESB (High) Query 40 relates. There is a general inconsistent use of terminology. Definitions used for terms in AP4 appear to be different from those used in the Trading and Settlement code. These should be aligned. Most fields in the Unit Data are still marked as Mandatory for Channel 2 even though they are not relevant for all unit types. For example Minimum Reservoir Capacity is 'Mandatory' but only Pump Storage units should be populating this field. When will definitive clarity on this issue be received?	✓	Participants will be seeking some advice as to how best populate default technical offer data during market trial registration, and market trial participation.	✓	ESB (High) (AP4) The terminology in AP4 should be aligned with the Code, or mapped to the Code. The validation rules will need to be set out for what Units are required to submit what data once these clarifications are received.
C41	✓	Already raised in query 406	✓	If participants can only query the last technical offer provided, this may lead to some clarifications required	✓	ESBPG (Medium) (AP4) Does AP4 (and systems) allow all

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
				as to why paragraph 3.28 in the Code is not facilitated		effective offers be viewed by a participant? If not, paragraph 3.28 of the Code will need a temporary section 7 derogation and AP4 will need corresponding adjustment
C44	✓	Already raised in query 400. Holding answer provided	✓	There may be a clarification required from the market trial team on the rules for default data on the nature of submitted default data (does it contain 25 hours) as this is not documented in AP4	✓	ESBPG (High) (AP4) If the holding answer to query 400 in the PRC log proves to be correct, a change to AP4 giving further detail on the AP default offer process may be warranted.
C45	✓	ESB (Low) AP4, Page 8, Table 2, Row 2, Column 4, second sentence. What does Approval time of at least 1 Working Day for a "Qualified Communication Channel" actually mean? What is the maximum time (not the lowest time of approval) of approval? What validation on the data submission is being performed?			✓	ESB (AP4) (Low) Following clarification of AP4, Page 8, Table 2, Row 2, Column 4, second sentence, there may be need for a clarifying Mod
C50	✓	Synergen (Low) Can Section 2.3.2 of AP5			✓	Synergen (AP5) (Low) Depending on the

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
		<p>be amended as follows to ensure that there is separation of roles in line with best practice? “The following roles will be designated to manage the security of the Market Operator’s Isolated Market System and for the avoidance of doubt each role must be held by a different individual:</p> <ul style="list-style-type: none"> • A Quality role will set out specific responsibilities for quality and security audit, system maintenance, technical authoring, familiarisation training and the security incident report procedure; • A Technical Operations role will set out responsibilities for computer/network security and database security; • A Facilities role will set out responsibilities for building security; • A Personnel Officer role will set out responsibilities for the training of staff on security matters. 				<p>outcome of discussion on “best practice” of roles described in Section 2.3.2 of AP5, there may be a requirement for a Code Mod.</p>
C51	✓	Synergen (Low) Can Section 2.3.9 of AP5			✓	Synergen (AP5) (Low) Depending on the

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
		<p>be amended so that the security regime endures also applies equally to any contractor staff working at the MO. The monitoring of this requirement should be part of the SEM audit function. The terms of reference for all staff including contractors' staff involved in delivering services associated with the Market Operator's Isolated Market System will be required to "comply at all times with the Market Operator security requirements and procedures from time to time in force". All employees and contractors' staff will be obliged to maintain customer confidentiality and these confidentiality obligations shall endure for a minimum of five year such these employees and contractors' staff cease to be employed or contracted to the Market Operator.</p>				<p>outcome of discussion on "best practice" described in Section 2.3.9 of AP5, there may be a requirement for a Code Mod.</p>
C56, C240	✓	Already raised in query 71			✓	NIE (High) CR already raised to implement

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
						AIP/SEM/07/120 (which involves the creation of new reports), but this will need to be progressed through the Mods Panel
C57	✓	ESB (High) 6.2.1 of the MPUD specifies that "F" is used for all reports. Should this be Fn? This does not align with the naming convention in the AP. Moreover, the naming convention for the reports on the SMO website has not been described.			✓	ESB (High) (AP6) 6.2.1 of the MPUD specifies that "F" is used for all reports. Should this be Fn? This does not align with the naming convention in the AP. Moreover, the naming convention for the reports on the SMO website has not been described. There is a potential for AP6 to change here.
C60, C61, C62	✓	ESB/NIE/VPE (High) General Reporting Queries against AP6/MPUD Also see NIE Supply's P460, P468, P469, P470, P471, P472, P473, P464, P475, P476, P477, P478, P479 TOD, COD, Generator Unit Technical Characteristics, Energy Limited Technical Characteristics are stated to be publicly available and on the MPI but are not				NIE (Medium) (AP6) There is a typo in AP6 for the third report of class "G" in Section 5.3. "G" Modified Interconnector User Nominations at 13:00 D+1, privately over MPI (the typo is here, D-1 should be D+1) "Revised Modified Interconnector User Nominations",

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
		<p>currently defined in the MPUD. We would want to automate capture of these via the MPI and need formats to be defined in the next MPUD.</p> <p>Capacity Invoice report requires specification</p> <p>1) There remains inconsistencies between MPUD v3, T&SC 1.3 and current AP6. This is having a negative impact on the finalisation of business processes and (forecasting) systems. Main examples of these include, but are not limited to:</p> <ul style="list-style-type: none"> -Publication time of Ex-ante Market Schedule -Publication of Technical Offer (TO) files 				<p>publication class "I" in Section 5.3 is potentially an erroneous duplicate of "Daily Revised Interconnector Modified Nominations"</p>
C63					✓	<p>VPE (Low) (AP6)</p> <p>2) We would prefer the following published via MPI as well as through the MO website</p> <ul style="list-style-type: none"> -Maintenance Schedule Transaction - Generator Outage Schedule (Monthly) -Maintenance Schedule

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
						Transaction - Transmission Outage Schedule (Monthly) -Any Important Updates to Maintenance Schedule - Generator Outage Schedule (Daily) -Any Important Updates to Maintenance Schedule - Transmission Outage Schedule (Daily)
C69					✓	VPE (Low) (AP6) The following data should be provided at D+1, and not only after the capacity period: -Indicative Eligible Availability -Initial Eligible Availability -Initial Ex-Post Loss of Load Probability
C73	✓	Synergen (High) The list of failure events in AP7 does not include the broadest sense of MSP failure, in particular: • calculation or publication of the indicative market schedule on the day before trading; Can it be confirmed that			✓	Synergen (Medium) (AP7) Section 5.1 Step 2 Complete part 1 of the Emergency Communication Form and notify impacted Parties of the General System Failure and list

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
		although not proceduralised in AP7 that the SMO will act in this event.				<p>which of the following deadlines have been missed or are about to be missed:</p> <ul style="list-style-type: none"> • <u>calculation or publication of the indicative market schedule on the day before trading;</u> • calculation or publication of the System Marginal Price or any component thereof for any Trading Period; • Settlement of any Unit for any Billing Period; • calculation or publication of Capacity Payments or the issuance of a Settlement Statement for Capacity Payments and Capacity Charges for any Capacity Period. <p>Inform impacted Parties whether or not Administered</p>

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
						Settlement has been invoked. Proceed from Step 3 and Step 6
C79					✓	<p data-bbox="1623 508 1913 930">Synergen (Medium) (AP7) Various forms within AP07 require the sender to write their password on the form and fax / send it to the MO. This isn't secure as the password would be recorded on a form that is filed within the participant / MO as per 2.142 of the T&SC V2.0.</p> <p data-bbox="1623 963 1913 1295">"Each Party shall keep complete, accurate and up to date records whilst a Party to the Code and, where applicable, of its participation in the Pool for a minimum period of 3 years from the date of creation of such records."</p> <p data-bbox="1623 1328 1913 1356">These processes</p>

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
C89					✓	<p>require revision (if a secure confirmation of identity is required) as follows – the requirement for a password is replaced with a contact telephone number and the MO calls the sender to ask for two letters randomly selected from the password over the phone to preserve password integrity in line with standard password use.</p> <p>Alternatively the password requirement could be removed as it does not provide a secure additional confirmation of identity.</p> <p>Synergen (Medium) (AP9) Section 3.2.2 The 10 day period of grace for a participant to repost credit cover when their bank providing a LoC is found to be ineligible is too long and would lead to a significant period of</p>

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
						exposure to generators – this should be reduced to 2 working days consistent with any other increase requirement as per 3.1.1.
C97					✓	NIE (Medium) (AP9) The SMO should provide a daily calculation of credit cover for the month ahead by day to help the Participant understand any potential exposure.
C112, C131	✓	ESBCS/ESBN (Medium) What are the details of the Help Desk and when / where will these be published, i.e. operating hours, telephone numbers, email address etc.				
C114	✓	ESBCS (Medium) The participant should be notified of incident/request log number to enable follow up under AP11. Will this be done and if so how will this be done?				
C115	✓	ESBCS (Medium) Notification should be via email as well as website for				

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
		emergency releases under AP11. Will this be done?				
C116	✓	Synergen (Low) MOIMS availability in AP11: The precise measurement of this availability needs clarity – on the basis that scheduled downtime is excluded from the availability measure the target system availability is currently set too low – this should be 99.9% consistent with international best practice. Can the MOIMS be clarified to see if it does include scheduled downtime, and if yes, can the MOIMS be increased to 99.9%			✓	Synergen (Low) (AP11) When the definitions of MOIMS is provided and the 99% target level reevaluated, this should be included in AP11
C123					✓	Synergen (Low) (AP11) Section 3.2.1 Change management is described as software related but this may not always be the case. Change management should apply to new hardware, moving servers, new telecoms configurations (basically infrastructure) etc. This comment also applies to section 4.2.1

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
C137					✓	<p>step 2.</p> <p>Synergen (Low) (AP12) Regarding the minutes:</p> <p>There needs to be a process to define how formal minutes are agreed if there is a divergence of views. Synergen believes that it would not be appropriate for a functional secretariat to take such decisions. Thus, there needs to be a bullet points Synergen suggests :</p> <p>“In the event of a dispute regarding the form of the final minutes, a decision on the final wording will rest with the Chairperson”.</p>
C141	✓	Synergen (Low) On what timetable will the Market Operator publish the quarterly progress reports on Modifications' progress?			✓	<p>Synergen (Low) (AP12) Section 2.2, page 8, penultimate paragraph should be altered to set out the timelines for the publication of the quarterly report</p>
C141					✓	<p>Synergen (Low) (Section 2 Code/AP12)</p>

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
C144					✓	<p>There has been no provision relating to limit the liability of participants on the code modification committee. Propose to include something like "No Member or individual in any Code Modification committee shall be liable (in whatever capacity) and no employer of any such person shall be vicariously liable for any act or thing done or omitted to be done pursuant to, in relation to, in respect of or in connection with these Rules."</p> <p>ESBCS (Medium) (Code Section 2)</p> <p>While it is clear as to the duration of the term of the chairperson being limited to one year the AP and the T&SC v2.0 does not state the term of appointment of participant members. In the Code it states that initial members</p>

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
						appointed by the RAs will be for 2 years, however there is no clarity on the duration of the term for elected members. The code current states that nominations occur "for appointment to the Modifications Committee at such time as the then existing Modifications Committee may notify". This suggest that membership is ongoing and may cause difficulties if some participants lack adequate representation on the initial panel.
C160, C170	✓	ESBCS (Low) What are the contact details for the forms in AP13 and AP14?			✓	ESBCS (Low) (AP13/AP14) Forms should have the Market Operators contact details printed/displayed on the form as standard.
C162					✓	Synergen (Medium) (AP13) Various forms within AP13 require the sender to write their

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
						<p>password on the form and fax / send it to the MO. This isn't secure as the password would be recorded on a form that is filed within the participant / MO as per 2.142 of the T&SC V2.0.</p> <p>"Each Party shall keep complete, accurate and up to date records whilst a Party to the Code and, where applicable, of its participation in the Pool for a minimum period of 3 years from the date of creation of such records."</p> <p>These processes require revision (if a secure confirmation of identity is required) as follows – the requirement for a password is replaced with a contact telephone number and the MO calls the sender to ask for two letters randomly selected from</p>

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						<p>the password over the phone to preserve password integrity in line with standard password use.</p> <p>Alternatively the password requirement could be removed as it does not provide a secure additional confirmation of identity.</p>
C173	✓	<p>Synergen (Medium)</p> <p>Will the market operator's published list of participants contain sufficient contact information so that those raising a dispute have correct information to send the dispute to the dispute counterparties under AP14, 2.4, step 2</p>			✓	<p>Synergen (Low) (AP14)</p> <p>Market Operator, not the raising party, should circulate the dispute to the counterparties in Step 2 of 2.4 in AP14.</p>
C178	✓	<p>ESB (High)</p> <p>Can a worked example of currency costs be provided?</p>				
C187	✓	<p>VPE (Medium)</p> <p>Will the Market Operator facilitate faxed invoices as well as post?</p>			✓	<p>VPE (Low) (AP15)</p> <p>The AP should state that Invoices should also be faxed as well as posted</p>
C195	✓	<p>ESB (Medium)</p> <p>How is it intended that the</p>				

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
		MO and the MO's bank will "agree" the rate of exchange? Is there to be a competitive or benchmarking process whereby the MO knows it is receiving competitive FX rates? There could be large costs associated with this for the market participants to bear.				
C199a	✓	ESB (Medium) Is a draft of the proposed Bank Mandate for collateral reserve accounts available for review? When will it be available for review?				
C199b	✓	ESB (Medium) Has the "corporate website" referenced been established and is it operational?				
C205, C206	✓	ESB/ESBCS (Medium) Has there been an independent control and risk audit of National Irish Bank's Business eBanking Application?				
C207	✓	ESBCS (Medium) Clause 2.4 of AP17 – Will the market participants have access to the eBanking facility to view				

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
		balances etc? When will this be available?				
C213, C214	✓	ESB/ESBCS (Medium) How often will the MO provide bank statements to market participants on their monies in the cash collateral accounts?				
C215	✓	ESBCS (High) – Letter of Credit Already raised				
C217a	✓	Airtricity (Medium) More detail is required on the exact mechanics for movements in and out of the Collateral Reserve Account by a Participant. Even though this is a joint account between the Participant and the Market Operator, the Participant has no operational control over the account, hence the need fully specify how a Participant can, for instance, go about making withdrawals from the account. Like elsewhere in the document, agreed procedures with regard to forms to use, authorised signatories, what exact payment method will be used (same day, standard,				

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		CHAPS, BACS, etc.) and commitment to turnaround times, are needed.				
C217b	✓	Airtricity (Medium) While the Code allows the Market Operator to draw down credit by any means it chooses, does the MO have a (non-binding) preference for which order it thinks it may be drawn down? i.e. cash first and then LC or vice versa. Our preference would be for the former, i.e. cash first and then LC. We believe this would also be the Market Operator's preference as the administrative process for a cash call is bound to be easier than that for an LC call.				
C219	✓	ESB/ESBCS (Medium) If interest is to be paid quarterly (T&S code 6.23P) in relation to cash in the cash collateral accounts but how often is interest accrued? • Who will be the contact persons in relation to any issues arising from payments or receipts in the MO or the MO Bank? Contact list should issue to				

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
C220	✓	all participants? Synergen (Medium) Why does the bank account information need to be in Agreed Procedure and hence in the public domain (section 3.1 of AP17). Surely AP17 should allow any participant to request this information from the MO?			✓	Synergen (Medium) (AP17) Consider removing the banking details from AP17, making them available via the help-desk instead.
C224	✓	ESB (Medium) Can a full description of the treasury capabilities of the Market Operator (MO), the interaction of the MO with the MO Bank (National Irish Bank), the exchange rate procedures, and the systems and procedures in place be provided? If so, when?				
C230					✓	Synergen (Low) (AP1) 5.1.1 This section states that "The Participant defines the access roles and rights of its Users" where Participants can define user roles but not rights and so it should be amended as follows: "The Participant defines

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C231					✓	<p>the access roles and rights of its Users”</p> <p>Synergen (Low) (AP1) 5.1.4.2</p> <p>This should be amended to read “Appropriate users are provided Read-Write access to the “Registration” Functional Area and will be able to access data for all Units for the relevant Participant.”.</p>
C232					✓	<p>Synergen (Low) (AP1) 5.1.4.3</p> <p>This section is not explicit regarding what is being applied/reactivated or de-registered. This section should read “Can request to Apply/Reactivate/De-register Units for a particular market participant, by setting the request type to an appropriate value. However, these changes are applied to the system only after it has been reviewed and accepted by the</p>

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
C239					✓	<p>operator.”</p> <p>ESB (Medium) (AP6) The scope of data publication to be included in AP6 is derived from the TSC. However, the tables omit several items that Participants would expect to be provided. These include:</p> <ul style="list-style-type: none"> - Make Whole Payments (MWPub) - Estimated Capacity Price (ECP) - Capacity Payment Demand Price - Capacity Payment Generation Price - Availability Profiles (APuh) - Actual Availability (AAuh) at D+1 - PES wholesale-calculated Supplier Unit volumes in both jurisdictions <ol style="list-style-type: none"> 1. Half-hourly jurisdictional supplier-aggregate second-tier Supplier Unit volumes

Consultation / PRC Query	Raise new PRC Query?	Detail (priority)	Raise to MTWG	Detail (priority)	Raise to Mods Committee?	Detail (priority) (AP)
C243					✓	Synergen (Medium) (AP9) Make it clear in the AP9 in Appendix 2 that only one blended VAT rate will apply for all market products.
C244					✓	Synergen (Low) AP1 Section 2.4 There should be a minimum review period and therefore the last paragraph of this section should be amended as set out. “The MO shall perform periodic reviews (at least annually) of Credit Cover Providers on its published list to check if they continue to meet the Banking Eligibility Requirements. The Market Operator shall update the published list as necessary.”
P57					✓	NIE (Low) (AP10) The expression in AP10 “that it expects to receive” should be removed in the following statement in 3.2.2: “The Settlement Reallocation

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						<p>Agreement causes the Debited Participant to cover more than the Trading Payments or Capacity Payments that it expects to receive under the Code in respect of its Generator Units for that Settlement Period". This "expectation" is not appropriate, as cancellation only occurs as a matter of fact at the time of invoice creation.</p>
P139					✓	<p>VPE (Low) (AP1) The Code does not allow for the direct selling of one Unit from one Participant to another in the Code. The Code and systems should be altered to allow for this possibility, noting the need for consideration with the System Operators, Meter Data Providers, and the Trading Day / Settlement Day registration of Units.</p>