

## APPENDIX A RESPONSE TEMPLATE

### SUMMARY INFORMATION

<b>Respondent's Name</b>	Bord na Móna.
<b>Type of Stakeholder</b>	Generator
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### OVERVIEW

Bord na Móna welcomes the opportunity to respond to SEM-16-075, and would also like to formally state our appreciation for the extension afforded by the RAs. Bord na Móna is continuing to develop and expand its generation fleet, transitioning from carbon intensive to low carbon technologies.

Bord na Móna has a number of concerns with elements of the Draft TSC which cut across different generation technologies.

Bord na Móna is an active member of EAI and IWEA and has contributed to the respective submissions from these organisations to this consultation and in the first instance supports all the comments, amendments and recommendations detailed in those submissions. In this regard, and in the interest of a more streamlined process, the proposals/comments listed in the 'I-SEM TSC Comments' table below should be read in conjunction with the EAI & IWEA submissions.

Furthermore, Bord na Móna has concerns about how exactly a hybrid plant, with Priority Dispatch, registered as a Predictable Price Taker today, will participate in the market and in particular the Balancing Market.

## I-SEM TSC COMMENTS

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
1	Aggregation		HLD provides for aggregation of (non-dispatchable) RES units in the ex ante markets, the current drafting appears not to reflect this design principle.	Facilitate aggregated of non-dispatchable RES units in the ex ante markets that link through to the individual units for imbalance settlement.	

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2	Parameter Change Notice Period		It is not practicable or equitable to have provisions in the code which allow for 5 days notice of a change to code parameters	A default minimum of three months. BnM appreciate that there may need to be exceptions to this time periods for specific parameters, which can be address on a case by case basis, but are of the opinion that the 3 months should be the default period.	For the avoidance of doubt, where parameters are 'annual' parameters, eg various charges, exchange rates etc., these parameters should not be capable of being altered within year.

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
3	Recognise Hybrid Unit as Unit Type	B.7.2.2	Recognition of a Hybrid Unit as specific class of unit will facilitate modifications necessary for the equitable and transparent treatment of such units in I-SEM.	<i>B.7.2.2(j) Hybrid Units</i>	Note for the avoidance of doubt Hybrid Unit refers to a dispatchable unit capable of operating on different fuels, one or more of which is supported.
4	Suspension	B.18.3.1(O)	In this instance, Suspension appears excessive as participants should have cover in the BM	Removal of clause	
5	Termination	B.18.6.1(d)	These appears excessive	Removal of clause	

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6	Zero Marginal Cost Plant	D.4.4.12	<p>This clause is equivocal, leaving aside the reality that even wind generation has a non-zero cost of production, the clause is ambiguous and perhaps redundant, as any 'dispatchable' plant (with PD) will most likely have a non-zero marginal cost.</p>	<p>Removal; or else clarify / formally define the situation when a dispatchable plant with priority dispatch has zero-marginal costs (logic would suggest that any plant which consumes a fuel to drive the prime mover falls out of the reach of this clause)</p>	
7	Determination of Demand Control Quantities (ASP Trigger)	E.4.5.1.(b) i and ii	<p>Local voltage issues are outside the visibility and direct influence of a market participant – it is inequitable to trigger a system wide ASP arising from a local voltage event</p>	<p>Removal of clauses E.4.5.1.(b) i and ii</p>	

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8	Dispatch Data Curtailment Flag	F.2.1.4 & Glossary	Need to define Curtailment and Curtailment Flag as it relates to a dispatchable PD unit	Note that the formal RA definition in SEM-13-010 relates to curtailment during tie-break events	
9	Ex ante Market Data	F2.2.2	There should be an additional paragraph added after F.2.2.2 stating that participants will have the ability to carry out their own credit assessment at any time and that the result of the Market Operators credit assessment for each participant will be made available to that particular participant.		

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
10	Commercial Offer Data to be used	F3.3.2(b)	Section F.3.3.2 (b) should be amended to remove NIV tagging of an action as a reason to settle an action based on three part offers rather than its simple offers. In addition to amending F.3.3.2 (b), this would require deletion of F.3.3.2 (b)(ii). NIV Tagging should not be a reason to settle a unit off three part offers. The SO flagging process will already have identified whether the unit is under a constraint.	Amendment of F.3.3.2 (b) and deletion of F.3.3.2 (b)(ii)	

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11	Information Imbalance Quantities and Charge	F.10.1.1	Given the SEMC stated position to recognise the absolute implementation of PD; as currently drafted there is no differentiation between a conventional dispatchable plant and a dispatchable plant with PD, which undermines / eliminates the expected position that should accrue to PD units	Redraft F.10.1.1(e) to read <i>A Unit which has Priority Dispatch; or</i>	
12	Financial Settlement	Credit Cover Arrangements	Since NEMO is settled daily there should be an option to prepay a settlement day that has not yet been issued. The additional payment option will reduce a participant's exposure to credit cover increase notices.	Introduce option to prepay a settlement day that has not yet been issued	

NB please add extra rows as needed.