

Energy Trading Arrangements Trading and Settlement Code Consultation

A response by SONI and EirGrid

24 January 2017



Introduction

EirGrid and SONI

EirGrid holds licences as independent electricity Transmission System Operator (TSO) and Market Operator (MO) in the wholesale trading system in Ireland, and is the owner of the System Operator Northern Ireland (SONI Ltd), the licensed TSO and MO in Northern Ireland. The Single Electricity Market Operator (SEMO) is part of the EirGrid Group, and operates the Single Electricity Market on the island of Ireland.

Both EirGrid, and its subsidiary SONI, have been certified by the European Commission as independent TSOs, and are licenced as the transmission system and market operators, for Ireland and Northern Ireland respectively. EirGrid also owns and operates the East West Interconnector, while SONI acts as Interconnector Administrator for both of the interconnectors that connect the island of Ireland and GB.

EirGrid and SONI, both as TSOs and MOs, are committed to delivering high quality services to all customers, including generators, suppliers and consumers across the high voltage electricity system and via the efficient operation of the wholesale power market. EirGrid and SONI therefore have a keen interest in ensuring that the market design is workable, will facilitate security of supply and compliance with the duties mandated to us and will provide the optimum outcome for customers.

EirGrid and SONI are responsible for operating the balancing market through our TSO licences and the Network Codes. We are also responsible for administering the Trading and Settlement Code for the balancing market, and settlement of the Capacity Market, under our Market Operator licences. This response is on behalf of EirGrid and SONI in their roles as TSOs and MO for Ireland and Northern Ireland, including as operators of the Balancing Market and the Capacity Market.

Structure of the Response

This document sets out EirGrid and SONI's response to the SEM Committee's consultation on the Energy Trading Arrangements, Trading and Settlement Code published on 15 November 2016. It is set out in three sections plus an appendix:

- Section 2 of the response provides an overview of the key points that EirGrid and SONI would like to emphasise as being of most importance.
- Section 3 of the response provides some general comments, which provide context for our comments on the detailed drafting.
- Our comments on the detailed drafting of the code are presented in the format requested and appended to this response paper as Appendix 1.

We would be happy to meet with the RAs to discuss any aspect of this response.

Key Themes

As a general comment, the Code seems to us to be robust and fit for purpose. We believe that it should provide a sound basis for the operation of the balancing market forming part of the new I-SEM trading arrangements and is generally consistent with our understanding of the applicable SEM Committee decisions. We note, however, that other aspects of those arrangements are still under development and some changes may be required to reflect the outcomes of other consultations.

There are a limited number of matters that arise where we consider changes to the draft Code should be pursued and these are the primary focus of this submission. We include detailed comments on the drafting of the code in Appendix 1 to this response paper.

These cover the following key themes:

- **NEMO arrangements:** we suggest some amendments to the drafting of section B. 8.1.2 to ensure that the code remains suitable and compliant with rights and obligations set out under EU regulations.
- **Definitions:** we propose a number of updates to definitions, both in the glossary and elsewhere, to ensure consistency with the Grid Code and also consistency within the document.
- **Agreed Procedures:** we propose clarifications to a number of agreed procedures, including changes to ensure alignment across the agreed procedures
- **Capacity Settlement:** we propose some updates to the calculations to align with SEMC decisions in relation to recent escalations made by participants through the Rules Working Group, including clarification of definitions
- **Alignment with other provisions:** we propose a number of edits to remove ambiguity around alignment between the TSC and the I-SEM design, the Capacity Market Code and the wider regulatory framework.

General Comments

In addition to the detailed comments provided in the format requested and appended to this response paper, we would like to highlight the following more general issues.

Financial Regulations

We are currently undertaking a review of the extent that financial regulations may apply to the TSC and CMC. In order to ensure compliance with relevant legislation, changes to Part B of the TSC may need to be proposed to ensure the trading arrangements are on a sound legal footing prior to their coming into effect. We hope to be in a position to submit any proposed updates to the RAs for consideration in the coming weeks.

Certification of Market Systems

Certification is a process being performed to first ensure alignment of vendor functional documentation with the rules, then (later) to verify alignment of systems to vendor functional documentation. Certification is being applied to imbalance pricing and capacity market functions. While Certification will primarily lead to changes in functional documentation, it could also highlight potential issues in the codes (e.g. manifest errors, or conflicts). As Certification is a longer term process its outputs are not available at this time.

The list of drafting changes identified in Appendix 1 to this paper does not include any changes that could be required as a result of Certification.

Agreed Procedures

Appendix 1 to this response includes a number of suggested updates to the draft Agreed Procedures. In addition to these specific updates, we note some more general points below.

We are reviewing each of the process flow diagrams contained in the Agreed Procedures and are developing updated versions to ensure that they are:

- (i) consistent with the corresponding procedural step table; and
- (ii) in a format that is readable.

It is thought that a format of process flow diagram similar to that used in the Capacity Market Code would be the best approach. This submission refers to a number of instances where, in order for process flow diagrams to be updated, the corresponding procedural step table would need to be split-up into a number of tables based on each scenario that it covers.

The procedural step tables at section 3 of each agreed procedure set out the method for each required communication. In order to ensure that there are no ambiguities, we are currently reviewing the methods of communication referred to in order to ensure that the information provided is accurate, e.g. references to “Type 2 Channel” should be updated to refer to a specific form of communication such as “email”. In instances where no method of communication is specified, this will need to be reviewed and updated as required.

Where applicable, the references will need to be included to the Code in the Agreed Procedures in order to assist the reader e.g. step 1 in section 3.2.1 of Agreed Procedure 18: “Suspension and Termination” should state “in accordance with paragraph B.18.2.3 of the Code” at the end of the step description in order to confirm the rule under which a Default Notice is issued.

The Agreed Procedures contain a number of placeholders where the information required to complete a section of the document is not available. We note that these sections will need to be updated as soon as the relevant details are available.

A number of additional minor editorial updates are required throughout the Agreed Procedures e.g. correction of typos and re-wording of phrases for clarity.

Appendix 1: Response Template

SUMMARY INFORMATION

Respondent's Name	EirGrid and SONI
Type of Stakeholder	System Operator / Market Operator
Contact name (for any queries)	Sarah Friedel
Contact Email Address	sarah.friedel@gmail.com
Contact Telephone Number	+44 (0)28 90707490

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	B.7.2.10(i)	Clarification of the Role of Relevant Meter Operator for AGUs	This update is required to align with the change made to section C 6.1.4 agreed at the I-SEM metering working group where the responsibility of ‘installing, commissioning and maintaining such meters’ was clarified as that of the ‘Relevant Meter Operator’ and not the ‘Meter Data Provider’, please see section C.6.1.4 .	<i>(i) all Generators comprising the Aggregated Generator Unit have Interval Metering to meter Generation of those Generators, installed by the Meter Data Provider Relevant Meter Operator responsible for installing, commissioning and maintaining such meters.</i>	C.6.1.4 has already been updated to reflect the role of the Relevant Meter Operator for Generators.

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
2	B.8.1.2	SEM NEMO Obligations	<p>Article 81 of the EU guidelines on capacity allocation and congestion management (2015/1222) affords the right to a NEMO to delegate <i>“all or part of any task assigned to it under this Regulation to one or more thirds parties”</i>. This right, however, does not appear to be fully reflected in the draft of Part B of the TSC. Paragraph B.8.1.2 outlines roles and obligations that must fall under the SEM NEMO, some of which relate to functions and tasks that a NEMO may delegate to a third party. The drafting explicitly places the obligation on the SEM NEMO which could obstruct their right to delegate tasks as permitted. As the CACM is a superior document in the order of priority to the TSC, this creates a conflict between the two which needs to be resolved.</p>	<p>Insert new paragraph B.8.1.4 as follows: Where:</p> <ul style="list-style-type: none"> (a) a SEM NEMO delegates to any person (“Delegate”) any of its tasks under the EU Guideline on Capacity Allocation and Congestion Management; and (b) one or more of the SEM NEMO’s obligations under paragraphs B.8.1.2(c) to (f) relates to the task which has been delegated (“Related Obligation”), <p>then:</p> <ul style="list-style-type: none"> (c) the SEM NEMO shall procure that the Delegate accedes to the Framework Agreement and thereby becomes a Party to this Code; (d) the delegate shall perform the Related Obligation; and (e) the SEM NEMO is relieved of the Related Obligation [to the extent that the Delegate performs it.] 	

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3	Glossary	Clarification of Outturn Availability	<p>On 29 September 2015, the SEMC published Decision Paper SEM-15-071 “Process for the Calculation of Outturn Availability”. In this decision paper, the SEMC note that Outturn Availability is not adequately defined in the Trading and Settlement Code (TSC) and requires that the TSOs bring forward a modification commensurate with this decision paper. Mod_08_15 was raised by the TSOs to clarify Outturn Availability in the TSC, as per SEMC direction. It was approved unanimously at the TSC Modification meeting in December 2016. As such these new definitions should be reflected in the TSC – Part B.</p>	<p>As per Mod_08_15: Availability means a Generator Unit’s capability in MW to deliver Active Power or a Demand Side Unit’s capability of reducing the Active Power consumed on the Trading Site, <i>declared to the TSO as required under the relevant Grid Code.</i></p> <p>Outturn Availability means the set of <i>Outturn Availability data (as defined under the relevant Grid Code)</i> for a Generator Unit provided for a previous Trading Day submitted in accordance with paragraph D.6.3.1.</p> <p>Primary Fuel Type Outturn Availability means the subset of <i>Outturn Availability data (as defined under the relevant Grid Code)</i> for a Dual Rated Generator Unit pertaining to the Availability of the Dual Rated Generator Unit based on its Primary Fuel Type provided for a previous Trading Day submitted in accordance with paragraph D.6.3.1.</p> <p>Secondary Fuel Type Outturn Availability means the subset of <i>Outturn Availability data (as defined under the relevant Grid Code)</i> for a Dual Rated Generator Unit pertaining to the Availability of the Dual Rated Generator Unit based on its Secondary Fuel Type provided for a previous Trading Day submitted in accordance with paragraph D.6.3.1.</p>	D.6.3 & D.6.4

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4	Agreed Procedure 3, Paragraph 2.7.2	Maintaining a Type 2 Channel	Insert text in relation to Communication Channel Qualification re-test. This shall allow the Market Operator to review a Participant's ability to interact with the market as required (for example if a Participant upgrades their system) in order to ensure proper functioning of the Balancing Market in accordance with the objectives of the Code.	Insert the following text at the end of the paragraph: <i>The System Operators may instruct a Participant to perform a Communication Channel Qualification retest at any time in accordance with Agreed Procedure 5 "Data Storage and IT Security".</i>	
5	Agreed Procedure 3, Section 2.8	Security Breach Reporting	Insert additional clause to confirm Participant security breach reporting requirement.	Insert the following text at the end of the section: <i>A Participant shall inform the System Operators of any security breach of its Isolated Market Systems as soon as it becomes aware of such breach.</i>	

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6	Agreed Procedure 17, Section 2.5	Payment References	New text should be included for clarification in relation to the application of administrative fees for payments made to the Market Operator. Agreed Procedure 15 "Settlement and Billing" refers to such administrative fees however clarity is required in relation to their application under Agreed Procedure 17.	Insert the following text at the end of the first paragraph: <i>If a Participant makes a payment to the Market Operator without using the applicable payment reference in accordance with this Agreed Procedure, an administrative fee may apply. Details of administrative fees are available on the Market Operator's website.</i>	
7	Agreed Procedure 1, Paragraph 2.3 (f)	Units as Part of Trading Sites	Second sentence at 2.3 (f) is out of context and should be included at 2.3 (e).	Move second sentence in 2.3 (f) to the end of 2.3 (e).	
8	Agreed Procedure 1, Section 2.6.1	Appointing a Data Processing Entity	Incorrect use of defined terms.	In the first paragraph replace the term " <i>Settlement Statements</i> " with " <i>Settlement Documents</i> ".	
9	Agreed Procedure 1, Section 2.6.2	Updating Registration Data	Text to be deleted as it is duplicating information set out in Agreed Procedure 4.	In the second paragraph delete the following text: <i>Default Commercial Offer Data or a subset of Default Technical Offer Data.</i>	

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10	Agreed Procedure 1, Section 2.6.2	Updating Registration Data	Text incorrectly states that a certain procedure is set out in Agreed Procedure 4.	In the fourth paragraph replace the following text: <i>procedure set out in Agreed Procedure 4 “Data Transaction Submission and Validation” should be followed</i> with: <i>change in Registration Data will be approved</i>	
11	Agreed Procedure 1, Appendix 2	Access Roles and Rights of Users	Inclusion of additional text to provide clarity to Participants that they shall manage and approve User access and rights and that the Market Operator shall not have a role in approving this.	Under the heading “User Types” insert the following text at the end of the first paragraph : <i>There shall be no requirement for the Market Operator to approve this information</i>	
12	Agreed Procedure 1, Appendix 2	Access Roles and Rights of Users	Inclusion of additional text to provide clarity to Participants that they shall manage and approve User access and rights and that the Market Operator shall not have a role in approving this.	Under the heading “Access Roles for each Functional Area” insert the following text at the end of the first paragraph: <i>There shall be no requirement for the Market Operator to approve this information.</i>	

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13	Agreed Procedure 14, Section 3.2	Dispute Resolution Board Composition	Update required for consistency with the Code in relation to composition of the Dispute Resolution Board.	Update procedural step table in accordance with section B.19.6 of the TSC.			
14	Agreed Procedure 11, Section 2.3.3	Rectification Timelines for Failures of Market Operator's Isolated Market Systems	The Trading and Settlement Code and Agreed Procedures set the requirements for the Market Operator in respect of its obligations. The method by which the Market Operator is measured against these requirements through the use of key performance indicators is more appropriately managed outside the market rules and Agreed Procedures.	Delete all of section 2.3.3 of Agreed Procedure 11.			
15	Glossary	Changes for Reserve in Capacity Settlement	As part of implementing the TSO proposal to the "Exposure to CRM due to Operational Constraints" escalation, a definition of the types of reserves considered, and the new variables created, should be added.	<p>Add a row with the following information:</p> <table border="1" data-bbox="1234 1107 1899 1166"> <tr> <td data-bbox="1234 1107 1458 1166">Replacement Reserve</td> <td data-bbox="1458 1107 1899 1166">has the meaning given in the relevant Grid Code.</td> </tr> </table>	Replacement Reserve	has the meaning given in the relevant Grid Code.	
Replacement Reserve	has the meaning given in the relevant Grid Code.						

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16	Variables	Changes for Reserve in Capacity Settlement	As part of implementing the TSO proposal to the “Exposure to CRM due to Operational Constraints” escalation, a definition of the types of reserves considered, and the new variables created, should be added.	<p>Add rows with the following information:</p> <table border="1"> <thead> <tr> <th data-bbox="1234 486 1332 507">Topic:</th> <th data-bbox="1332 486 1451 507">Plain Text:</th> <th data-bbox="1451 486 1608 507">Long Name:</th> <th data-bbox="1608 486 1839 507">Definition/Description:</th> <th data-bbox="1839 486 1928 507">Units:</th> </tr> </thead> <tbody> <tr> <td data-bbox="1234 507 1332 738">Variable</td> <td data-bbox="1332 507 1451 738">FSS_{u,φ}, FSS_{u,γ}</td> <td data-bbox="1451 507 1608 738">System Service Flag</td> <td data-bbox="1608 507 1839 738">The System Service Flag for a Generator Unit, u, in an Imbalance Pricing Period, φ, or an Imbalance Settlement Period, γ, as applicable, to identify units that are bound by an Operational Constraint relating to specific system services.</td> <td data-bbox="1839 507 1928 738">Factor</td> </tr> <tr> <td data-bbox="1234 738 1332 1088">Variable</td> <td data-bbox="1332 738 1451 1088">QDIFFC_{SS}_{u,γ}</td> <td data-bbox="1451 738 1608 1088">System Service Difference Quantity</td> <td data-bbox="1608 738 1839 1088">The System Service Difference Quantity for a Generator Unit, u, in an Imbalance Settlement Period, γ, representing the proportion of the unit’s Obligated Capacity Quantity which is deemed to be satisfied through the unit being identified as being bound by Operational Constraints relating to specific system services.</td> <td data-bbox="1839 738 1928 1088">MWh</td> </tr> </tbody> </table>	Topic:	Plain Text:	Long Name:	Definition/Description:	Units:	Variable	FSS _{u,φ} , FSS _{u,γ}	System Service Flag	The System Service Flag for a Generator Unit, u, in an Imbalance Pricing Period, φ, or an Imbalance Settlement Period, γ, as applicable, to identify units that are bound by an Operational Constraint relating to specific system services.	Factor	Variable	QDIFFC _{SS} _{u,γ}	System Service Difference Quantity	The System Service Difference Quantity for a Generator Unit, u, in an Imbalance Settlement Period, γ, representing the proportion of the unit’s Obligated Capacity Quantity which is deemed to be satisfied through the unit being identified as being bound by Operational Constraints relating to specific system services.	MWh	
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17	F.18	Changes for Reserve in Capacity Settlement	As part of implementing the TSO proposal to the “Exposure to CRM due to Operational Constraints” escalation, a new section should be added between F.18.5 and F.18.6 which determines whether or not a System Service Difference Quantity should be calculated.	<p>F.18.6 Calculation of System Service Difference Quantities</p> <p>F.18.6.1 For each Imbalance Pricing Period, φ, the Market Operator shall use information from the most recent Indicative Operations Schedule to identify whether a Generator Unit’s scheduled output is bound by the presence of an Operational Constraint relating to the provision of Replacement Reserve, and where it determines that the Generator Unit is so bound, shall set the System Service Flag ($FSS_{u\varphi}$) for that Generator Unit, u, to a value equal to zero for that Imbalance Pricing Period, φ. Otherwise, the Market Operator shall set the System Service Flag to a value equal to one for that Imbalance Pricing Period. If the System Service Flag for a Generator Unit has a value equal to zero for any Imbalance Pricing Period, φ, within the Imbalance Settlement Period, γ, the Market Operator shall set the System Service Flag ($FSS_{u\gamma}$) for that Generator Unit, u, in that Imbalance Settlement Period, γ, to a value equal to zero. Otherwise, the Market Operator shall set the System Service Flag to a value equal to one for that Imbalance Settlement Period.</p>	

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18	F.18	Changes for Reserve in Capacity Settlement	As part of implementing the TSO proposal to the “Exposure to CRM due to Operational Constraints” escalation, a new section should be added between F.18.5 and F.18.6 which calculates System Service Difference Quantity.	<p>F.18.6.2 The Market Operator shall calculate the System Service Difference Quantity (QCSS_{uγ}) for each Generator Unit, u, in each Imbalance Settlement Period, γ, as follows:</p> $QCSS_{u\gamma} = \text{Max}((q_{u\gamma} \times \text{Max}(QEX_{u\gamma}, QD_{u\gamma}), 0) \times (1 - FSS_{u\gamma}) - \text{Max}(QEX_{u\gamma}, QD_{u\gamma}), 0) \times (1 - FSS_{u\gamma})$ <p>where:</p> <ul style="list-style-type: none"> (a) qAA_{uγ} is the Actual Availability for Generator Unit, u, in Imbalance Settlement Period, γ; (b) QEX_{uγ} is the Ex-Ante Quantity for Generator Unit, u, in Imbalance Settlement Period, γ; (c) QD_{uγ} is the Dispatch Quantity for Generator Unit, u, in Imbalance Settlement Period, γ; (d) DISP is the Imbalance Settlement Period Duration; and (e) FSS_{uγ} is the System Service Flag for Generator Unit, u, in Imbalance Settlement Period, γ. 	

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19	F.18	Changes for Reserve in Capacity Settlement	As part of implementing the TSO proposal to the “Exposure to CRM due to Operational Constraints” escalation, a new section should be added between F.18.5 and F.18.6 which includes the System Service Difference Quantity in the Tracked Difference Quantity before it is used in calculation of Non-Performance Difference Charges for most cases.	<p>F.18.6.3 The Market Operator shall recalculate the Tracked Difference Quantity (QDIFFTRACK_{Ωγ}) for each Capacity Market Unit, Ω, which does not represent an Autoproducer Unit, in each Imbalance Settlement Period, γ, as follows:</p> $QDIFFTRACK_{\Omega\gamma} = \text{Min} (QDIFFTRACK_{\Omega\gamma}, QDIFFTRACK'_{\Omega\gamma}) + \sum_{u \in \Omega} QDIFFCSS_{u\gamma}$ <p>where:</p> <ul style="list-style-type: none"> (a) QCOB_{Ωγ} is the Obligated Capacity Quantity for Capacity Market Unit, Ω, in Imbalance Settlement Period, γ; (b) QDIFFTRACK'_{Ωγ} is the Tracked Difference Quantity for Capacity Market Unit, Ω, in Imbalance Settlement Period, γ, calculated in accordance with section Error! Reference source not found.; (c) QDIFFCSS_{uγ} is the System Service Difference Quantity for Generator Unit, u, in Imbalance Settlement Period, γ; and (d) $\sum_{u \in \Omega}$ is a summation over all Generator Units, u, which comprise the Capacity Market Unit, Ω. 	

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20	F.18	Changes for Reserve in Capacity Settlement	As part of implementing the TSO proposal to the “Exposure to CRM due to Operational Constraints” escalation, a new section should be added between F.18.5 and F.18.6 which includes the System Service Difference Quantity in the Tracked Difference Quantity before it is used in calculation of Non-Performance Difference Charges for autoproducers.	<p>F.18.6.4 The Market Operator shall recalculate the Tracked Difference Quantity (QDIFFTRACK_{sy}) for each Trading Site, s, which is associated with a Capacity Market Unit, Ω, which represents an Autoproducer Unit, in each Imbalance Settlement Period, γ, as follows:</p> $QDIFFTRACK_{sy} = \text{Min} (QCOB_{sy}, QDIFFTRACK'_{sy} + \sum_{u \in s} QDIFFCSS_{uy})$ <p>where:</p> <ul style="list-style-type: none"> (a) QCOB_{sy} is the Obligated Capacity Quantity for Trading Site, s, in Imbalance Settlement Period, γ; (b) QDIFFTRACK'_{sy} is the Tracked Difference Quantity for Trading Site, s, in Imbalance Settlement Period, γ, calculated in accordance with section Error! Reference source not found.; (c) QDIFFCSS_{uy} is the System Service Difference Quantity for Generator Unit, u, in Imbalance Settlement Period, γ; and (d) $\sum_{u \in s}$ is a summation over all Generator Units, u, in the Trading Site, s. 	

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21	Appendix E, Paragraph 4	Changes for Reserve in Capacity Settlement	As part of implementing the TSO proposal to the “Exposure to CRM due to Operational Constraints” escalation, the new data variables created should be included in the list of data items published, according to Table 8.	<p><u>Add rows with the following information to Table 8:</u></p> <table border="1"> <thead> <tr> <th>Time</th> <th>Item</th> <th>Term</th> <th>Subscript</th> </tr> </thead> <tbody> <tr> <td>By 16:00 Two Working Days after Trading Day and by 17:00 Five Working Days after Trading Day</td> <td>System Service Flag</td> <td>FSS</td> <td>uy</td> </tr> <tr> <td>By 16:00 Two Working Days after Trading Day and by 17:00 Five Working Days after Trading Day</td> <td>System Service Difference Quantity</td> <td>QDIFFC SS</td> <td>uy</td> </tr> </tbody> </table>	Time	Item	Term	Subscript	By 16:00 Two Working Days after Trading Day and by 17:00 Five Working Days after Trading Day	System Service Flag	FSS	uy	By 16:00 Two Working Days after Trading Day and by 17:00 Five Working Days after Trading Day	System Service Difference Quantity	QDIFFC SS	uy	
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22	Appendix G, Paragraph 13	Changes for Reserve in Capacity Settlement	As part of implementing the TSO proposal to the “Exposure to CRM due to Operational Constraints” escalation, the new data variables created should be included in the list of data items included on a settlement statement.	Add the items “System Service Flag” and “System Service Difference Quantity” to the list of items under paragraph 13.													
23	Glossary	Demand Control	Suggest amending to align with Grid Code definition that refers to Demand Control as being any such enforced demand reduction but being applied here for a system wide event.	<p>Replace existing definition with :</p> <p>Means Demand Control as defined in the Grid Codes and invoked for the purposes of managing a system wide energy imbalance as identified in section E.4.</p>													

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24	Glossary	Demand Side Unit MW Capacity	Suggest amending definition to align with Grid Code.	Change definition to read: Means the maximum change in Active Power that can be achieved by a Demand Side Unit in accordance with the Grid Code.	
25	Glossary	Dwell Time Down	Suggest amending to align with Grid Code, and clarify that the definition applies at any operating point within the range not just if moving through the full range.	Change definition to read: Means the duration for which the Generator Unit must remain at that Dwell Time Down Trigger Point during a change in its MW Output while ramping down <u>at outputs</u> between Maximum Generation and Minimum Generation.	
26	Glossary	Dwell Time Down Trigger Point	Suggest amending to align with Grid Code, and clarify that the definition applies at any operating point within the range not just if moving through the full range.	Change definition to read: Means a constant MW level at which a Generator Unit must remain while ramping down <u>at outputs</u> between Maximum Generation and Minimum Stable Generation, with the first point corresponding to the lowest constant MW level.	

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27	Glossary	Dwell Time Up	Suggest amending to align with Grid Code, and clarify that the definition applies at any operating point within the range not just if moving through the full range.	Change definition to read: Means the duration for which the Generator Unit must remain at that Dwell Time Up Trigger Point during a change in its MW Output while ramping up at outputs between Minimum Generation and Maximum Generation.	
28	Glossary	Dwell Time Up Trigger Point	Suggest amending to align with Grid Code, and clarify that the definition applies at any operating point within the range not just if moving through the full range.	Change definition to read: Means a constant MW level at which a Generator Unit must remain while ramping up at outputs between Minimum Generation and Maximum Generation, with the first point corresponding to the lowest constant MW level, with the first point corresponding to the lowest constant MW level.	
29	Glossary	End Point of Start Up Period	Current definition appears odd - refers to an output level rather than a time.	Needs review - Grid Code definition is "The time after which the rate of change of the Generating Unit Output is not dependent upon the initial Warmth of the Generating Unit."	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
30	Glossary	Maximum Storage Quantity	To align with Grid Code - and current definition refers to "Generation" which is production of active power, rather than energy.	Suggest changing definition to: is part of the Technical Offer Data for a Pumped Storage Unit and means the maximum quantity of <u>Generationenergy</u> that can be <u>generatedproduced</u> by the reservoir for a Trading Day submitted in accordance with paragraph D.5.1.4.	
31	Glossary	Minimum Storage Capacity	To align with Grid Code - and current definition refers to "Generation" which is production of active power, rather than energy.	Suggest changing definition to: is part of the Technical Offer Data for a Pumped Storage Unit and means the minimum quantity of <u>Generation-energy</u> that can be <u>generatedproduced</u> by the reservoir for a Trading Day submitted in accordance with paragraph D.5.1.4.	
32	Glossary	Registered Capacity	Current definition appears incorrect - refers to Appendix 1: Registration.	Suggest changing definition to: Means the maximum Active Power in MW that a Generator Unit can deliver on a sustained basis at the Export Point submitted for the Generator Unit as Registration Data or Technical Offer Data in accordance with Appendix H: "Data Requirements for Registration" and Appendix I: "Offer Data" respectively.	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
33	Glossary	Shut Down	Term not used (other than as part of "Shut Down Cost"), and would otherwise be in conflict with same term in Grid Code.	Delete defined term.	
34	Agreed Procedure 18, Section 3.2.1	Issuing a Suspension Order in accordance with paragraph B.18.3.1 of the Code	Provide clarification in relation to timing of procedural step.	At step 4 replace the phrase <i>"As required"</i> with <i>"In accordance with paragraph B.18.3.1 of the Code"</i> .	
35	Agreed Procedure 18, Section 3.4	Issuing of a Termination Order	Incorrect reference to paragraph B.18.8.3 of the TSC.	Delete the following text at the end of the step description: <i>"(Party being Terminated must remain in compliance with conditions set out in paragraph B.18.8.3 of the Code for Termination to take effect)"</i>	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
36	Agreed Procedure 3, Section 2.1	Qualification for Communication Channels	Provide clarity in relation to Communication Channels to be maintained.	<p>Insert the following text at the beginning of the section:</p> <p><i>“The Market Operator shall establish and maintain three types of Communication Channel in accordance with paragraph C.2.1.1 of the Code.”</i></p>	
37	Agreed Procedure 3, Section 2.2	Obtaining a Digital Certificate	Provide confirmation that one digital certificate shall suffice for access to both the Capacity Market and Balancing Market.	<p>Insert the following text as a second paragraph:</p> <p><i>“A Digital Certificate obtained in accordance with this Agreed Procedure for access to the Balancing Market Interface shall also provide certification for access to the Capacity Market. One Digital Certificate is required for access to both the Balancing Market and Capacity Market.”</i></p>	
38	Agreed Procedure 3, Section 2.7.1	IT Security Requirements	Update language to prevent ambiguity.	Replace the phrase <i>“could affect”</i> with <i>“may result in”</i> .	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
39	Agreed Procedure 3, Section 3.1	Obtaining a Digital Certificate	Update incorrect references to "Certificate Authority".	<p>At step 7 replace "Certificate Authority" with "Market Operator" in the "By / From" column.</p> <p>At step 7 replace "Certificate Authority" with "Balancing Market Interface" in the "By / From" column.</p>	
40	Agreed Procedure 3, Section 3.1	Obtaining a Digital Certificate	Update step description in accordance with system design.	At step 10 replace the phrase "by entering a new password and verify" with "and change".	
41	Agreed Procedure 3, Section 3.2	Communication Channel Qualification	Remove step that is included at the incorrect part of the procedure description.	Delete step 8.	
42	Agreed Procedure 3, Section 3.3	Digital Certificate Cancellation	Provide confirmation that cancellation of a digital certificate revokes access to the Balancing Market and Capacity Market (as applicable).	<p>Include the following note at the end of the procedural step description:</p> <p><i>"Note: Cancellation of a Digital Certificate shall revoke access to both the Balancing Market and Capacity Market (as applicable)".</i></p>	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section					
43	Agreed Procedure 3, Section 3.3	Digital Certificate Cancellation	Update step description to provide clarity on the activity being carried out.	At step 5 replace the following step description: <i>“Place Digital Certificate on revocation list”</i> with <i>“Update revocation list to include Digital Certificate”</i>						
44	Agreed Procedure 3, Section 3.4	Communication Channel Suspension	Include a new step to demonstrate the obligation on the Market Operator to confirm corrective action is complete and notify Participants accordingly.	<p>Insert the following as a new step 8 and update step numbers accordingly:</p> <table border="1" data-bbox="1234 683 1944 1050"> <tr> <td data-bbox="1234 683 1435 1050">Verify that corrective action is complete. If corrective action is not complete, notify Participant and return to step 6. If corrective action is complete, continue to step 9.</td> <td data-bbox="1435 683 1592 1050">As soon as practicable following notification at step 7</td> <td data-bbox="1592 683 1682 1050">E-fax / Email</td> <td data-bbox="1682 683 1816 1050">Market Operator</td> <td data-bbox="1816 683 1944 1050">Participant</td> </tr> </table>	Verify that corrective action is complete. If corrective action is not complete, notify Participant and return to step 6. If corrective action is complete, continue to step 9.	As soon as practicable following notification at step 7	E-fax / Email	Market Operator	Participant	
Verify that corrective action is complete. If corrective action is not complete, notify Participant and return to step 6. If corrective action is complete, continue to step 9.	As soon as practicable following notification at step 7	E-fax / Email	Market Operator	Participant						
45	Agreed Procedure 3, Section 3.4	Communication Channel Suspension	Remove inaccurate reference to another section of the Agreed Procedure.	<p>At step 12 delete the following text at the beginning of the step description:</p> <p><i>“Go to step 1 of section 1.1 of this Agreed Procedure to”.</i></p>						

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
46	Agreed Procedure 3, Appendix 1	Appendix 1: Definitions	Add additional text to the definition of User in order to inform reader that details in relation to User access rights are set out in another Agreed Procedure.	<p>Insert the following text at the end of the definition of “User”:</p> <p><i>“The procedure in relation to registration of User access rights is set out in Agreed Procedure 11 “Market System Operation, Testing, Upgrading and Support”.”</i></p>	
47	Agreed Procedure 9, Section 3.4	Changes to Posted Credit Cover	This procedural step table needs to be split-up based on each scenario that it covers in order for the corresponding process flow diagram to be updated to a readable format.	<p>It is suggested that the procedural step table set out in section 3.4 should be split-up into five separate procedural step tables covering each of the following scenarios:</p> <ul style="list-style-type: none"> (a) Proposed change to Posted Credit Cover is a new Letter of Credit; (b) Proposed change to Posted Credit Cover is an amendment to an existing Letter of Credit; (c) Proposed change to Posted Credit Cover is Cover is a deposit Cash; (d) Proposed change to Posted Credit Cover is Cover is a request cancellation of existing Letter of Credit; and (e) Proposed change to Posted Credit Cover is an amendment to an existing Letter of Credit. 	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
48	Section C.6 of Part C	Review of Transitional Arrangements for Modification Committee	In light of RA modification on Part A of the Trading and Settlement Code, these provisions may need to be reviewed accordingly.	It is suggested that Cutover Time is replaced with Amendment Date; The role of the Modification Committee in the transition period needs to be clarified between TSOs and the RAs.	
49	Agreed Procedure 9, Section 3.7	Excess Cash Collateral Standing Request	Update incorrect reference to other steps in the procedure.	At step 3 replace “step 6” with “step 8”.	
50	Agreed Procedure 7, Section 3.3 and Section 3.4	Offer Data Limited Communication Failure and Standard Limited Communication Failure	Update step descriptions to provide for circumstance where a Limited Communication Failure is not valid.	At step 3 at each section insert the following text at the end of the step description: <i>“of outcome. If Limited Communication Failure is not valid, end process.”</i>	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
51	Agreed Procedure 11, Section 2.1.5	Remove incorrect reference to Query Management System	Remove an incorrect description of a system.	<p>In the first paragraph the following text::</p> <p><i>“All Helpdesk Requests will be logged in the Market Operator’s Balancing Market Query Management System”</i></p> <p>should be replaced with:</p> <p><i>“All Helpdesk Requests will be logged by the Market Operator”</i>.</p>	
52	Agreed Procedure 11, Section 2.2.2 and Section 3.2	Update references to impact assessments	“Impact Assessments” are incorrectly described as being “High Level”.	Replace all references to “ <i>High Level Impact Assessment</i> ” with “ <i>impact assessment</i> ”.	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
53	B.19.6.3	Updating process of submitting a Referral Notice for consistency with current practice	All initial communications in relation to the Referral Notice are done through the Market Operator as the DRB has not yet been appointed.	<p>Update paragraph B.19.6.3 as follows:</p> <p><i>The Disputing Party shall immediately send a copy of any Referral Notice which it issues to the Market Operator (or to the Regulatory Authorities where the Market Operator is a Disputing Party), and the Market Operator shall forward the Referral Notice to the chairperson of the Panel referred to in paragraph B.19.6.6.</i></p>	
54	Glossary	Update definition of Referral Notice	All initial communications in relation to the Referral Notice are done through the Market Operator as the DRB has not yet been appointed.	<p>Update the definition of Referral Notice as follows:</p> <p><i>“in relation to a Dispute, means a notice in writing from a Disputing Party to the <u>Market Operator and other Disputing Parties</u> identifying the Dispute and referring it to a Dispute Resolution Board under paragraph B.19.2.1, B.19.4.1 or paragraph B.19.6.2.”</i></p>	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
55	Agreed Procedure 11, section 3.2	Workshop re Change Management for Scheduled Releases	Incorrect reference to Consultation Workshop to be updated for consistency with current practice.	At step 3 replace reference to <i>“Consultation Workshop”</i> with <i>“technical workshop”</i> .	
56	Agreed Procedure 11, section 3.4	Post Event Reporting	Incorrect reference to another step in the procedure.	In the second paragraph of the step description in step 1 replace <i>“step 4”</i> with <i>“step 3”</i> .	
57	Agreed Procedure 14, Section 3.1	Raising a Dispute	Include additional text to clarify the sequence of steps in the procedural steps table.	At step 10, insert the following text at the end of the step description: <i>“If the attempt to resolve the Dispute has been unsuccessful, go to step 13a or step 13b (as applicable)”</i> .	
58	Agreed Procedure 14, Section 3.1	Raising a Dispute – Referral Notice	All initial communications in relation to the Referral Notice are done through the Market Operator who shall forward it to the chairperson of the Panel.	At step 13a and step 13b replace the existing text in the <i>“To”</i> column with the following text: <i>“Market Operator (Regulatory Authorities where the Market Operator is a Disputing Party), Dispute Counterparties”</i> .	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
59	Agreed Procedure 14, Section 3.1	Raising a Dispute – Referral Notice	All initial communications in relation to the Referral Notice are done through the Market Operator who shall forward it to the chairperson of the Panel.	<p>If the attempt to resolve the Dispute by negotiation has been unsuccessful within the Negotiation Period, any Disputing Party may send a Referral Notice to the other Disputing Parties Market Operator and other Disputing Parties, continue to step 14.</p> <p><u>If the Dispute is not referred to the DRB by way of a Referral Notice, the Dispute is deemed to be withdrawn, end process</u></p>	
60	Agreed Procedure 14, Section 3.1	Raising a Dispute – Referral Notice	All initial communications in relation to the Referral Notice are done through the Market Operator who shall forward it to the chairperson of the Panel.	<p>Unless the Market Operator determines that a manifest error has occurred, a Disputing Party shall may send a Referral Notice to the other Disputing Parties Market Operator and other Disputing Parties continue to step 14.</p> <p><u>If the Dispute is not referred to the DRB by way of a Referral Notice, the Dispute is deemed to be withdrawn, end process.</u></p>	
61	Agreed Procedure 14, Section 3.1	Raising a Dispute – Referral Notice	This information is included in step 13.	Delete step 15.	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
62	Agreed Procedure 1	Update incorrect references to Meter Data Provider	Incorrect references to Meter Data Provider.	Replace references to “ <i>Meter Data Provider</i> ” with “ <i>Relevant Meter Operator</i> ”.	
63	Agreed Procedure 1, Section 3.2.4	Registration – Validation of Meter Data at Go Live	Update procedural step description to state that the Relevant Meter Operator validates Meter Data.	Replace the text at step 4.7 with the following: “ <i>Validate Meter Data and notify of Effective Date.</i> ”	
64	Agreed Procedure 1, Section 3.2.4	Registration – Validation of Meter Data at Go Live	Delete step as information included in the previous step.	Delete step 4.8.	
65	F.18.5.5	Amending equation to align with design	In the formula following the first "If" statement in this paragraph, there is a "Min" function. This should instead be a "Max" function. The intention is to calculate the quantities of trades selling generation (i.e. positive trades) which are exposed to Difference Charges. All other sections does this using a "Max" function.	Change "Min" to "Max" in first calculation of $QDIFFCTED_{\Omega yk}$ in paragraph F.18.5.5.	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
66	F.16.1.3	Finalising timing aspects of provisions	The timing of this provision has not been finalised. To be consistent with similar provisions in other sections of the code (e.g. F.10.1.4 and F.10.1.5), this could be made 5 working days.	"F.16.1.3 The System Operators shall provide to the Market Operator, [within 5X Working Days] of the Regulatory Authorities' approving a value, data source or methodology for a parameter referred to in paragraph F.16.1.1, the approved value, data source or methodology, in accordance with Appendix K "Other Market Data Transactions"." - and remove highlighting.	
67	F.16.1.4	Finalising timing aspects of provisions	The timing of this provision has not been finalised. To be consistent with similar provisions in other sections of the code (e.g. F.10.1.4 and F.10.1.5), this could be made 5 working days.	"F.16.1.4 The Market Operator shall publish the approved value, data source or methodology for a parameter referred to in paragraph F.16.1.1, and the date and time on which it comes into effect, within [5X Working Days] of receipt of the Regulatory Authorities' approval." - and remove highlighting.	
68	F.16.1.6	Finalising timing aspects of provisions	The timing of this provision has not been finalised. To be consistent with similar provisions in other sections of the code (e.g. F.10.1.4 and F.10.1.5), this could be made 5 working days.	"F.16.1.6 The Market Operator shall publish the approved value of, or methodology for, a parameter referred to in paragraph F.16.1.5, and the date and time on which it comes into effect, within [5X Working Days] of receipt of the Regulatory Authorities' approval." - and remove highlighting.	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
69	Glossary Definitions	Amending definitions to align with design	Ramp Rate definition includes a reference to "Interconnector Units" which is no longer relevant in the I-SEM arrangements and can therefore be deleted, however there are other Generator Unit types in the I-SEM arrangements which also don't have ramp rates which should be included.	"means the rate of increase or the rate of decrease in Active Power produced by a Generator Unit (excluding Interconnector Units (for which an assumed Ramp Rate applies in accordance with paragraph B.10.1.6), Trading Units, Assetless Units, Interconnector Error Units and Interconnector Residual Capacity Units) ."	
70	Appendix E 4 Table 2	Amending text to align with definitions	"Historical Assessment Period for the Billing Period" is not the defined term, and "Historical Assessment Period" on its own is only the concept of a period rather than data about the period. The data which should be referred to is "Days in Historical Assessment Period".	In the row with "Historical Assessment Period for the Billing Period", replace this term with "Days in Historical Assessment Period", replace the Term gamma with "DINHAP", and delete the Subscript "y".	
71	Agreed Procedure 9 Appendix 2	Amending text to align with design	Part (d) only outlines requirements for Interconnector Units, which are no longer relevant in the I-SEM arrangements. Therefore it can be deleted.	Delete Agreed Procedure 9 Appendix 2 Part (d).	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
72	G.12.1.6	Amending text to align with design	<p>This paragraph references the Daily Amount with respect to Generator Units and Capacity Market Units, saying that if a participant anticipates large differences in that between the following four billing periods and the previous four billing periods they should notify to MO to become an Adjusted Participant. However Credit Cover provisions for Capacity Market Units are not based on the approach of forecasting using statistical analysis of past values - therefore if amounts relating to Capacity Market Units are anticipated as being different in the future, it will not require the additional information Adjusted Participants are obliged to provide to feed this through to the Required Credit Cover calculation. Therefore it is suggested that the reference to CMUs is removed from this paragraph.</p>	<p>"G.12.1.6 Where a Participant reasonably expects that, compared with time-weighted average of Metered Demand across all of the four most recent Billing Periods, the forecasted averaged Metered Demand with respect to its Supplier Units in any of the next four Billing Periods will increase or decrease by more in absolute terms than the Credit Cover Adjustment Trigger, or the forecasted total Daily Amounts with respect to its Generator Units and - Capacity Market Units in any of the next four Billing Periods will increase or decrease in absolute terms by more than the Credit Cover Adjustment Trigger, then it shall notify the Market Operator as soon as reasonably possible. Such a Participant shall be called an Adjusted Participant. A Participant ceases to be an Adjusted Participant when the length of time between their notification as set out in paragraph G.12.1.5 and the last Imbalance Settlement Period covered in the most recent Settlement Statement issued for that Participant is greater than the length of time covered by the Historical Assessment Period."</p>	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
73	Glossary Definitions	Amending text to align with definitions	The definition of Settlement Risk Period refers to an Undefined Potential Exposure, which is a monetary amount. It should instead refer to the Undefined Exposure Period, which is a time amount.	“means the total period covered by the Actual Exposure Period and the Undefined Potential Exposure <u>Period</u> .”	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
74	All	Review of text to determine amendments to text needed to align with definitions	<p>There are a number of areas in the Code, the Appendices, the Glossary and the Agreed Procedures where terms are used in a way that different terms seem to be used for the same concept/data piece, some terms seem to be used without being defined, and some terms seem to be used for reasons which seem contrary to their definition. The terms include the following:</p> <ul style="list-style-type: none"> o “Lower Registered Output”; o “Minimum Generation”; o “Minimum Output” (including forecast and outturn values); o “Minimum Stable Generation” (including forecast and outturn values). 	<p>A review of the use of these terms, and a correction following this review to ensure that terms are used consistently with their definition and are not duplicating other terms where not required, should be undertaken.</p>	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
75	Glossary Definitions	Amending definitions to align with design	The second half of the definition for Aggregate Import Capacity can be deleted as it is no longer as relevant in the context of the I-SEM arrangements, where transfer capacity for imports is based on common calculation methodologies which may have different objectives to those in the SEM.	"in respect of an Interconnector, means the declared total ability of the Interconnector to import power into the SEM, submitted as part of Interconnector Registration Data. Under optimum conditions, the sum of import values for the active transfer capacity of the Interconnector will be equal to the Aggregate Import Capacity. "	
76	Glossary Definitions	Amending definitions to align with design	The second half of the definition for Aggregate Export Capacity can be deleted as it is no longer as relevant in the context of the I-SEM arrangements, where transfer capacity for exports is based on common calculation methodologies which may have different objectives to those in the SEM.	"in respect of an Interconnector, means the declared total ability of the Interconnector to export power from the SEM, submitted as part of Interconnector Registration Data. Under optimum conditions, the sum of export values for the active transfer capacity of the Interconnector will be equal to the Aggregate Export Capacity. "	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
77	F.19.1.2	Finalising timing aspects of provisions	<p>The timing of this provision has not been finalised. To be consistent with the SEM Committee decision on the third CRM consultation, the timing should reflect the flexibility afforded to the timing of T-1 auctions, as the results of these auctions are required to calculate the price considered in this paragraph. The decision paper (section 2.5.7) states that these auctions may be held between 13 and 2 months ahead of the Capacity Year. Therefore, if it is assumed that a number of weeks would be required to finalise the results from that auction, use these results to calculate these parameters and to draft the report outlining the rationale, if the auction is held 2 months prior to the Capacity Year the latest time by which the Market Operator would need be able to calculate such parameters may be one month prior to the start of the Capacity Year. However, other similar parameters on supplier charges (such as the Imperfections Price) are reported on at least four months prior to the start of the year, with the approved values published at latest two months prior to the start of the year, and if the Capacity Auction is carried out earlier into the period allowed it would make sense to align the calculation of these parameters with those other similar parameters. Therefore additional text may be required in this paragraph with conditions for different timing of these parameters based on the timing of Capacity Auctions.</p>	<p>"F.19.1.2 The Market Operator shall report to the Regulatory Authorities at least four months before the start of the Capacity Year <u>(or, if the final Capacity Auction for the Capacity Year is conducted later than five months before the start of the Capacity Year, in accordance with the Capacity Market Code, the Market Operator shall report to the Regulatory Authorities at least one month before the start of the Capacity Year)</u>, proposing the following parameters to be used in the calculation of Capacity Charges for that Capacity Year:"</p>	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
78	F.19.1.4	Finalising timing aspects of provisions	<p>The timing of this provision has not been finalised. To be consistent with the rationale highlighted in the comment for paragraph F.19.1.2, this should have text which reflects the different possibilities for decisions being made in this regard, i.e. if the Capacity Auction is held early this can be aligned with other similar parameters (2 months), if it is held later then the timing needs to be aligned with the timing of the report to the RAs.</p>	<p>"F.19.1.4 The Market Operator shall publish the approved value for each parameter referred to in paragraph F.19.1.2 within 5 Working Days of receipt of the Regulatory Authorities' approval or two <u>months</u> before the start of the Capacity Year to which they shall apply <u>(or, if the final Capacity Auction for the Capacity Year is conducted later than five months before the start of the Capacity Year, in accordance with the Capacity Market Code, the Market Operator shall publish the approved value for each parameter referred to in paragraph F.19.1.2 within 5 Working Days of receipt of the Regulatory Authorities' approval or two weeks before the start of the Capacity Year to which they shall apply)</u>, whichever is the later."</p>	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
79	F.19.1.5	Finalising timing aspects of provisions	The timing of this provision has not been finalised. To be consistent with the rationale highlighted in the comment for paragraph F.19.1.2, this should have text which reflects the different possibilities for decisions being made in this regard.	"F.19.1.5 The Regulatory Authorities will be taken to have approved a proposed parameter in the Market Operator's report under paragraph F.19.1.2 if they have not notified the Market Operator of an alternative one month s before the start of the Capacity Year to which it applies <u>(or, if the final Capacity Auction for the Capacity Year is conducted later than five months before the start of the Capacity Year, in accordance with the Capacity Market Code, one week before the start of the Capacity Year to which they shall apply).</u> "	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
80	F.19.1.9	Finalising timing aspects of provisions	The timing of this provision has not been finalised. The timing needs to be consistent with the need for this parameter to be available for the calculation of other parameters considered in paragraph F.19.1.2, and therefore would be needed in advance of the reporting stage of those parameters.	"F.19.1.9 If the Regulatory Authorities have not made a determination under paragraph F.19.1.8 five months before the start of a Capacity Year <u>(or, if the final Capacity Auction for the Capacity Year is conducted later than five months before the start of the Capacity Year, in accordance with the Capacity Market Code, if the Regulatory Authorities have not made a determination under paragraph F.19.1.8 at least two months before the start of a Capacity Year)</u> , then the charge base for the previous Capacity Year shall continue to apply (with any necessary modifications)."	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
81	Glossary Definitions	Review of definitions to determine amendments to definitions needed to align with design	In the definition for the EU Guideline on Electricity Transmission System Operation, it is noted that this is still in draft and the numbering has not been finalised. The numbering will not be assigned until sometime after the completion of this code, so this may not be possible to address now and a modification once the Guideline has been completed may need to be considered.	Consider if any changes are required to cover the interim period between this Code becoming live, and the Guideline referenced being finalised. A modification to the Code may be required once the Guideline has been finalised.	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
82	Appendix O paragraphs 3 and 4	Finalising timing aspects of provisions	The timing of this provision has not been finalised. Detailed timings on such a topic are best dealt with through other areas, such as Agreed Procedures and settlement timetables, therefore in order to remove potential for inconsistencies, it is suggested that detailed timing is removed from these paragraphs.	"3. Physical Notification Instruction Profiling and Pseudo Instruction Profiling for the purpose of Bid Offer Acceptance calculation as set out in Chapter F "Calculation of Payment and Charges", section F.6.2, shall, be performed after each Imbalance Pricing Period for the purpose of being used in the Imbalance Price calculation and by [XX:XX] on D+1 and D+4 for the purpose of Imbalance Settlement Calculation. 4. Uninstructed Imbalance Instruction Profiling for the purpose of Undelivered Quantity calculation and Uninstructed Imbalance calculation as set out in Chapter F "Calculation of Payment and Charges", sections F.6.6 and F.9, shall be performed by [XX:XX] on D+1 and D+4 for each Imbalance Settlement Period."	
83	Glossary Definitions	Amending definition to align with design	The glossary definition of Net Imbalance Volume (QNIV) refers to E.3.5.1, but that section refers to the Net Imbalance Volume Tag (TNIV). It should refer to E.3.4.1.	Change the reference as stated in the comment.	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
84	Glossary Definitions	Amending definition to remove inconsistencies	The T&SC Glossary definition for Warm State is inconsistent with the one for Warm Cooling Boundary and Warm State in the T&SC and Grid Code.	<p>Change definition of Warm State to the following:</p> <p>“means cold, warm, or hot, dependent upon the period of time which has elapsed post Desynchronisation of a Generator Unit relative to its Hot Cooling Boundary and its Warm Cooling Boundary. Up until the Hot Cooling Boundary, the Generator Unit is hot. At and below<u>Above</u> the Hot Cooling Boundary and up until the Warm Cooling Boundary, the Generator Unit is warm. At and - below<u>Above</u> the Warm Cooling Boundary, the Generator Unit is cold.”</p>	

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85	F.4.2.3	Review of text to determine amendments to text needed to align with design	<p>The text in this paragraph gives a broad indication of the approach to be taken in determining the loss factors of interconnectors. While this may be currently sufficient as all requirements for determining interconnector loss factors are internal to the SEM, it may not be sufficient in the future as loss factors may have to take into account requirements from other markets which are governed by European mechanisms. Any difference between the calculation method or scope of the losses included in the ex-ante markets and the balancing market could impact on the costs allocated to end users, for example through increases in dispatch balancing costs. In the coming months, decisions are expected to be made around the treatment of interconnector losses in the ex-ante markets. We would therefore like to highlight that the wording of this condition and the treatment of interconnector losses in the balancing market may need to be amended to ensure that the signals presented by the TLAFs continue to drive efficient outcomes for consumers and market participants. In the interim period, we will continue to work with both RAs to determine appropriate loss factors for the year October 2017 to September 2018.</p>	Project Team to consider text changes required for the treatment of interconnector losses.	

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86	Agreed Procedure 5, Section 3.1	Cancellation of Unit Under Test	Delete a step as information included should be included in the title to the procedural step table.	Delete step 1 and re-number other steps accordingly.	
87	Agreed Procedure 5, Section 3.1	Cancellation of Unit Under Test	Remove information that should be included later in the procedural step table for consistency with practice.	<p>At step 4 update the step description as follows:</p> <p>“If approving the cancellation of the Unit Under Test UUT in the MOI. Set MO Status to ‘Approved’. Go to 1.5</p> <p>If rejecting the cancellation of the Unit Under Test UUT in the MOI, deny change of status on the MO Status and e-mail Participant stating request has been rejected, end of process. Go to Step 1.4”.</p>	
88	Agreed Procedure 5, Section 3.1	Cancellation of Unit Under Test	Include information in step description that has been removed from a previous step for consistency with practice.	<p>At step 5 update the step description as follows:</p> <p>“If approving the cancellation of the Unit Under Test UUT in the MOI. Set MO Status to ‘Approved’.</p> <p>Deny change of status on the MO Status and e-mail Participant stating request has been rejected. End of process.”.</p>	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
89	Agreed Procedure 5, Section 3.1	Physical Notifications	Update step description to reference amendment of Physical Notifications for consistency with practice.	At step 5 update the step description as follows: <i>“Email Participant stating the request has been accepted and requesting them to submit Commercial Offer Data <u>and amended Physical Notifications as appropriate</u> in the BMI.”.</i>	
90	Agreed Procedure 5, Section 3.1	Physical Notifications	Update step description to reference amendment of Physical Notifications for consistency with practice.	(a) Participant submits new Commercial Offer Data <u>and amended Physical Notifications as appropriate</u> in the BMI <u>Go to 1.7</u> <i>or</i> (b) Participant does not submit new Commercial Offer Data <u>and amended Physical Notifications as appropriate</u> in the BMI. <u>Go to 1.8</u>	

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
91	Agreed Procedure 5, Section 3.1	Physical Notifications	Update step description to reference amendment of Physical Notifications for consistency with practice.	<p>(a) SEMO use new submitted Commercial Offer Data <u>and amended Physical Notifications as appropriate</u> in the EA1 run</p> <p>or</p> <p>(b) <u>SEMO use standing Commercial Offer Data and amended Physical Notifications as appropriate in the EA1 run if Participant has not submitted new Commercial Offer Data</u></p>	
92	Agreed Procedure 5, Section 3.1	Cancellation of Unit Under Test	Delete step as information included in previous step.	Delete Step 9.	
93	Agreed Procedure 1, Section 3.2.2	Unit Registration - Validation	Update to reflect that during the Unit Registration process the Applicant communicates certain information with the System Operators / Relevant Meter Operator for the purposes of validation of Registration Data.	<p>At step 2.5 update the "To" column as follows:</p> <p><u>Market Operator System Operators / Relevant Meter Operator</u></p>	