

EAI Perspectives



15th February, 2018 Dundalk

Electrification of energy services for a decarbonised, sustainable future

Electricity Association of Ireland believe this can be achieved:

- In the overall interest of Society.
- Through Competitive markets.
- Fostering Investment and Innovation.
- Maintaining the reputation of the electricity sector

We promote this vision through Constructive engagement

- Welcome this opportunity for engagement.
- Particularly now with less than 100 days to "GO LIVE".

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I-SEM Considerations



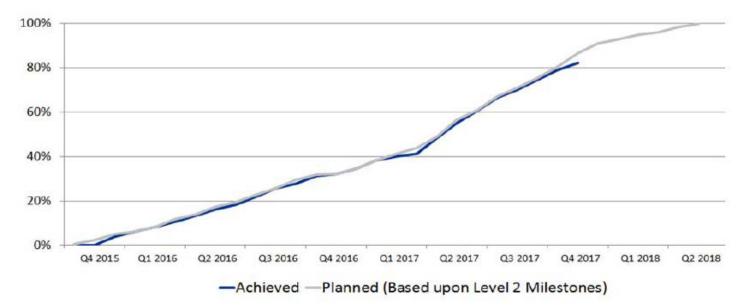
Market Participant Readiness ¹

- Participant readiness levels reported <u>are falling short of expectation</u>; message from participants is <u>that they will be ready</u> to commence the Market Trial from 1 December 2017 - as confirmed by the Readiness Statements received to date.
- <u>A number of immediate issues</u> impacting on parties' preparations were understandably front and centre,have each been addressed sufficiently to allow those parties to progress - for example, with their interface testing.
- Participants highlight risks associated with <u>uncertainty</u>,



1 - Market Readiness Assessment (MRA) Reports. Nov 2017. SEMO

Central Markets Project Progress



Market Participant Comparative Readiness 100% 80% 60% 40% 20% 0% Mar May Jul Aug Aug Sep May Oct Jan Jun Nov Jan Feb Mar Apr 2018 2017 2017 2017 2018 2016 2016 2017 2017 2017 2017 2017 2018 2018 2018



Expectations not being met leading to a loss of confidence and frustration

- The Central Markets Project team are not delivering to the Original Plan & specifications and not taking into consideration the ability of Market Participants to 'absorb' the changes.
- Concern that the Project appears to be managed primarily for the benefit of the 'Central Markets' rather than Market Participants.
- Market Participants have no real insight into CMS readiness given the ongoing design changes.



Elements of the solution are 'still in development mode, not "bug fixing mode'

- System Design not complete by market Trials.
- Design drops expected as late as April or May forcing redesigns.
- Real concern whether there is enough time to test systems internally for go-live.
- Not primarily due to Market Participant or vendor tardiness.

Solution providers (vendors) have not been able to provide timely solutions to participants – primarily because all the 'contingency' has been consumed by the Central Markets Project team.

- Production line analogy SEMOpx develop Systems > Vendors develop Solutions (e.g. ABB, Brady etc) > Participants deploy vendor or bespoke solutions.
- Because CMS Readiness is behind, so too are vendors, which has knock on impacts for market participants who need to test solutions internally.



Market Trials are being undermined

- Focus has been on delivering Type 2 communications but Type 3 just as important for participants.
- Market Participants were envisaging trading in the market with a Type 3 interface from 'go-live' to enable them to appropriately mitigate risk.
- Market Trial outcomes/usefulness has been compromised.
- Going live with systems not fully tested poses significant commercial and reputation risk for participants. Adding to the aggregate of commercial risks that the participant are being, unexpectantly, being required to carry.

External Dependencies

• Brexit

Interconnectors

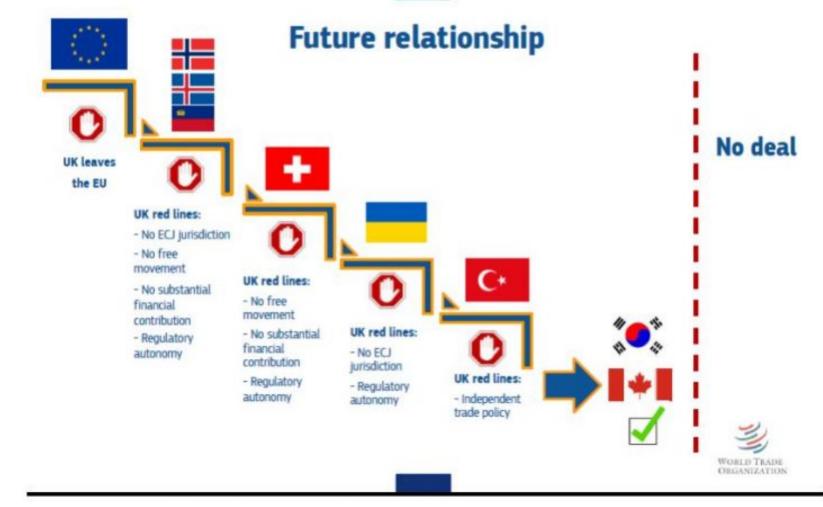


BREXIT - EAI Policy Position

• Desired outcomes

- No barriers to retention of SEM/ISEM.
- Energy , environment and related policy frameworks remain coordinated.
- Existing security of supply (gas) agreements maintained.
- Actions
 - Treat energy negotiations separately from Single Market.
 - Addressing energy issues is important but not most urgent.
 - Maintain status quo on energy through negotiations.
 - Not imperative that ECJ be the arbiter of disputes.





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Interconnection



EAI welcomed N-S Interconnector Decision

- A significant step in the transition of our energy system to one which will be almost fully decarbonised by 2050.
- Projected to deliver savings of €40m per annum from 2030.
- Need to ensure that any risks associated with BREXIT on project and finances are mitigated.



The Ask....

- Require remaining market participant readiness reports to be unequivocal.
- Move from "Development Mode" to "Bug Fix Mode".
- Prevent any further "contingency" being consumed by CMS Project team.
- Run "Market trials" that are as close to market conditions as possible.
- Require further opportunity needed to discuss these I-SEM issues again at a final Stakeholders meeting in April 2018 prior to "GO-LIVE"



END

