

Single Electricity Market (SEM)

Capacity Remuneration Mechanism 2024/25 T-3 Capacity Auction Parameters

Consultation Paper SEM-21-011

11 February 2021

1. EXECUTIVE SUMMARY

Under the revised SEM arrangements, implemented in October 2018, capacity revenues are allocated by capacity auction for a relevant capacity year. Prior to each capacity auction, a number of capacity auction parameters must be set. The list of parameters to be determined by the Regulatory Authorities is described in paragraph D.3.1.3 of the Capacity Market Code.

This paper describes the SEM Committee's proposals for the relevant parameters to apply in the 2024/25 T-3 capacity auction, scheduled to take place in January 2022. This is a supplementary auction to the 2024/25 T-4 auction held in January 2021. That auction procured 6,168MW of de-rated capacity.

Most of the parameters proposed are the same as those used in recent auctions, including the 2024/25 T-4 auction. However, the SEM Committee proposes to change the shape of the demand curve that is used in the auction.

The proposed parameters for consultation are:

Parameter	Proposed Value for 2024/25 T-3 capacity auction
De-Rating Curves, defining De-Rating Factors by unit Initial Capacity and by Technology Class (including for Interconnectors)	To be determined by System Operators prior to publication of Initial Auction Information Pack.
Capacity Requirement	To be determined by System Operators prior to publication of Initial Auction Information Pack.
Indicative Demand Curve	The Demand Curve will be based on the following principles: • horizontal at the Auction Price Cap between OMW and 100% of the adjusted Capacity Requirement;

		2007 6:1 "	10 "	
	 vertical at 100% of the adjusted Capacity Requirement between the Auction Price Cap and Net CONE; a straight line slope with a zero-crossing point at 115% of the adjusted Capacity Requirement. 			
Auction Price Cap	1.5 times Net CONE	i.e. €138,450 / de	-rated MW / year	
Existing Capacity Price Cap	0.5 x Net CONE i.e.	0.5 x Net CONE i.e. €46,150 / de-rated MW /year		
New Capacity Investment Rate Threshold	€300,000 /de-rated MW / year.			
Annual Stop Loss Limit Factor	1.5			
Billing Period Stop Loss Factor	0.5			
Indicative Annual Capacity Exchange Rate	To be determined by System Operators prior to publication of Initial Auction Information Pack.			
Increase Tolerance and Decrease Tolerance by Technology Class	Technology Class All Except DSUs DSUs	Increase Tolerance (%) 0	Decrease Tolerance (%) 0 100	

Performance Security Posting Dates / Events	Date / Event	Performance Security Rate (€/MW)
	More than 13 months	
	prior to the beginning of	10,000
	the Capacity Year	
	From 13 months to	
	beginning of Capacity	30,000
	Year	
	From beginning of Capacity Year	40,000
	Date / Event	Termination Charge Rat (€/MW)
	Date / Event More than 13 months	(€/MW)
	More than 13 months prior to the beginning of	
	More than 13 months prior to the beginning of the Capacity Year	(€/MW)
Termination Charges	More than 13 months prior to the beginning of the Capacity Year From 13 months to	(€/MW) 10,000
Termination Charges	More than 13 months prior to the beginning of the Capacity Year From 13 months to beginning of Capacity	(€/MW)
Termination Charges	More than 13 months prior to the beginning of the Capacity Year From 13 months to beginning of Capacity Year	(€/MW) 10,000
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Termination Charges	More than 13 months prior to the beginning of the Capacity Year From 13 months to beginning of Capacity Year From beginning of	(€/MW) 10,000 30,000
Termination Charges	More than 13 months prior to the beginning of the Capacity Year From 13 months to beginning of Capacity Year From beginning of	10,000 30,000
Termination Charges	More than 13 months prior to the beginning of the Capacity Year From 13 months to beginning of Capacity Year From beginning of	(€/MW) 10,000 30,000
Termination Charges	More than 13 months prior to the beginning of the Capacity Year From 13 months to beginning of Capacity Year From beginning of	(€/MW) 10,000 30,000

Full Administered Scarcity	Short Term Reserve	Administered Scarcity
Price and Reserve Scarcity	(MW)	Price (€/MWh)
Price Curve	Demand Control	25% of VOLL
	0	25% of VOLL
	500	DSU Theoretical Price
Anticipated values to be applied in determining the Strike Price	Current values to be re-app	blied.

Responses to the proposals within this consultation should be sent to Kevin Baron (Kevin.Baron@uregni.gov.uk) and Billy Walker (Billy.Walker@uregni.gov.uk) by 15 April 2021. We intend to publish all responses unless they have been marked as confidential.

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3. INTRODUCTION AND BACKGROUND

The SEM Capacity Remuneration Mechanism ("**CRM**") was developed through an extensive series of consultation and decision papers. The CRM allocates capacity payments through ex-ante capacity auctions.

A T-4 auction for the 2024/25 capacity year was held in January 2021. This procured 6,168 MW of de-rated capacity on an all-island basis.

Having observed the results of the T-4 auction for 2024/25, the SEM Committee notes that there remains a shortfall in the likely required capacity in some regions. Further, the Committee notes that some multi-year capacity procured in previous auctions has now been confirmed as terminated. As a result the Committee has decided to hold a supplemental, T-3, auction for the 2024/25 capacity year. The volumes to be procured in this auction will be determined by the SEM Committee following their usual process prior to the publication of the Final Auction Information Pack. This consultation paper is about parameter setting only.

Before each capacity auction, the Capacity Market Code ("CMC") requires a number of auction parameters to be determined by the Regulatory Authorities ("RAs" (the Utility Regulator in Northern Ireland and the Commission for Regulation of Utilities ("CRU") in Ireland).

Parameters to be determined

Paragraph D.3.1.3 of the CMC requires the Regulatory Authorities to determine the following parameters for each Capacity Auction, and provide them to the System Operators for inclusion in the applicable Initial Auction Information Pack:

- (a) the De-Rating Curves, defining De-Rating Factors by Technology Class (including for Interconnectors);
- (b) the Capacity Requirement;
- (c) an indicative Demand Curve;
- (d) the Auction Price Cap;

- (e) the Existing Capacity Price Cap;
- (f) the €/MW rate of the New Capacity Investment Rate Threshold;
- (g) the Annual Stop-Loss Limit Factor;
- (h) the Billing Period Stop-Loss Limit Factor;
- (i) the indicative Annual Capacity Payment Exchange Rate;
- the Increase Tolerance and Decrease Tolerance by Tolerance Class that may be applied by a Participant in its Application for Qualification to Capacity Market Unit de-ratings;
- (k) in respect of Performance Securities:
 - (i) the final Performance Security Posting Dates/ Events applicable to Awarded Capacity allocated in the Capacity Auction; and
 - (ii) for each Performance Security Posting Date/ Event, the final €/MW rate to be applied in setting Performance Securities applicable to Awarded Capacity allocated in the Capacity Auction;
- (I) the €/MW fee rates for calculating Termination Charges;
- (m) values for the Full Administered Scarcity Price and the Reserve Scarcity Price; and
- (n) anticipated values for the parameters to be applied in determining the Strike Price.

There is one other issue relevant to the functioning of the 2024/25 T-3 auction which is covered by this consultation in regards to the treatment of constraints.

4. PARAMETERS REQUIRED BY THE CAPACITY MARKET CODE

As described, the Regulatory Authorities must determine the following parameters:

(a) the De-Rating Curves, defining De-Rating Factors by Technology Class (including for Interconnectors);

A De-Rating Curve is a curve for a Technology Class that represents the De-Rating Factor applicable by unit Initial Capacity and Initial Maximum On Time to be used in a Capacity Auction. A De-Rating Factor describes the proportion of Initial Capacity of a Generator Unit or Interconnector that can contribute towards satisfying the Capacity Requirement to be used in a Capacity Auction.

The System Operators published a methodology for the Calculation of Capacity Requirement and De-rating factors prior to the 2019/20 T-1 capacity auction¹. This is a least-worst regrets analysis which selects the demand forecast level to be used for the Capacity Market auction. The De-Rating Factors are those that are used to derive the Capacity Requirement selected by the least-worst regrets analysis.

This methodology will be followed in determining the de-rating factors for the 2024/25 T-3 capacity auction. These will not necessarily be the same as the de-ratings used for the T-4 auction for this capacity year.

(b) the Capacity Requirement;

The Capacity Requirement is the de-rated capacity required to satisfy the SEM Security Standard for a specific Capacity Year to be used in a Capacity Auction. The SEM Security Standard is the standard specified by the Regulatory Authorities for the annual loss of load expectation to be maintained in the SEM i.e. the number of hours per year for which load curtailment may occur due to demand exceeding available capacity. In CRM Detailed Design Decision 1² the SEM Committee decided to retain the security standard at 8 hours LOLE.

¹SEM-18-030a: https://www.semcommittee.com/news-centre/i-sem-crm-t-1-cy201920-capacity-auction-parameters-and-enduring-de-rating-methodology

² SEM-15-103, section 2.2.16

The System Operators published a methodology for the Calculation of Capacity Requirement and De-rating factors prior to the 2019/20 T-1 capacity auction.

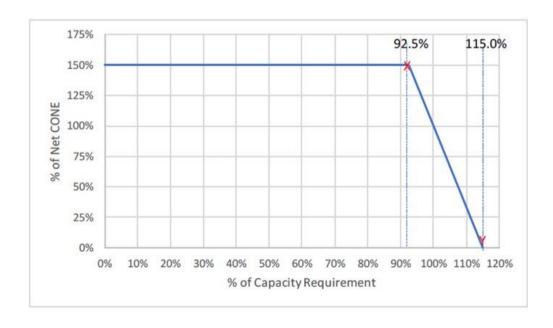
This methodology will be followed by in determining the Capacity Requirement for the 2024/25 T-3 capacity auction. This will not necessarily be the same as the Capacity Requirement calculated for the 2024/25 T-4 auction.

(c) an indicative Demand Curve;

The Demand Curve is a curve determined by the Regulatory Authorities representing the deemed per MW value of each level of capacity that could be awarded in the Capacity Auction.

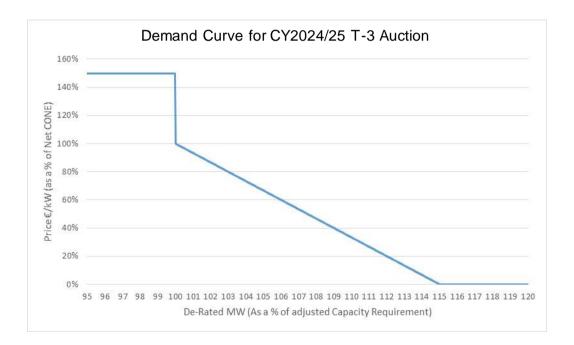
The Demand Curve for the 2024/25 T-4 auction was set in in accordance with the following principles:

- Horizontal at the Auction Price Cap from 0MW to 92.5% of the adjusted Capacity Requirement.
- Slopes down in a straight line to 115% of the adjusted Capacity Requirement.
 The line passes through the point at where the volume is equal 100% of the
 adjusted Capacity Requirement and the price equals Net CONE (€92,300 / derated MW / year).



The above curve has the potential to under-procure compared to the adjusted Capacity Requirement. While any under-procurement in a T-4 auction can be resolved in a subsequent T-3 auction, a T-3 auction should aim to procure all of the adjusted Capacity Requirement. For this reason, all transitional auctions held to date under the revised SEM arrangements have been based on the following principles:

- horizontal at the Auction Price Cap between 0MW and 100% of the adjusted Capacity Requirement;
- vertical at 100% of the adjusted Capacity Requirement between the Auction Price Cap Net CONE;
- a straight line slope with a zero-crossing point at 115% of the Capacity Requirement.



The 2024/25 T-4 auction procured the following volumes:

Northern Ireland	Rest of Ireland	Greater Dublin	Ireland	Total
1,648	2,993	1,527	4,520	6,168

The Capacity Requirement described in part (a) above will be adjusted to account for these volumes. In accordance with paragraph F.3.1.4 of the Capacity Market Code, other adjustments to the Capacity Requirement will include:

- a) Capacity already awarded for the 2024/25 Capacity Year in other relevant auctions:
- b) an allowance for changes in forecast capacity requirements (as considered appropriate by the Regulatory Authorities);
- c) an allowance for capacity to be procured in later auctions for the Capacity Year (as considered appropriate by the Regulatory Authorities); and
- d) an allowance for the de-rated value of capacity that is forecast to be operational during the Capacity Year but which will not be participating in the Capacity Auction (as considered appropriate by the Regulatory Authorities).

(d) the Auction Price Cap;

The Auction Price Cap is the maximum bid price allowed in a Capacity Auction. For all previous auctions, this has been set at 1.5 times Net CONE.

Net CONE is currently €92,300 / de-rated MW / year, as determined in the T-4 CY2022/23 BNE Decision Paper³.

The SEM Committee propose to continue to apply a multiplier of 1.5 time Net CONE in setting the Auction Price Cap for the 2022/23 T-1 capacity auction. Auction Price Cap will therefore continue at €138,450 / de-rated MW / year, and the Sterling equivalent using the indicative Annual Capacity Payment Exchange Rate from the Initial Auction Information Pack.

(e) the Existing Capacity Price Cap;

The Existing Capacity Price Cap ("**ECPC**") is the price cap applicable to Existing Capacity in a Capacity Auction. It is a uniform non-technology specific cap on the price that Existing Generators and interconnectors can offer volume at, unless they apply to the RAs for a Unit Specific Price Cap ("**USPC**")⁴. New Capacity and DSUs are not subject to the ECPC, and may bid up to the Auction Price Cap.

³ SEM-18-156

⁴ Or submit an Opt-Out Notification on the grounds that they are going to close before the end of the relevant Capacity Year.

ECPC performs two key functions:

- Firstly, it limits the ability of generators with market power, but low Net Going Forward Costs ("NGFCs") to exercise their market power through making high offers. Given the significant concerns about market power in the CRM (see SEM-16-010), it is important that the ECPC is not set at a level significantly above where the market is expected to clear in current market conditions.
- Secondly it provides a filter to ensure that only those USPC applications which
 the RAs need to scrutinise (because they may have a material impact on the
 clearing price or pay-as-bid prices) are scrutinised. If the ECPC is set too low,
 then offer prices which are below the clearing price (and therefore will have no
 impact on the clearing price or pay-as-bid prices) will need to be reviewed,
 imposing an unnecessary administrative burden on both the RAs and bidders.

In all capacity auctions to date, ECPC has been set at 0.5 times Net CONE. The rationale for this value was:

- It was estimated that the vast majority of plant required to meet the Capacity Requirement could bid at its Net Going Forward Cost without needing to apply for a USPC;
- It is consistent with relevant international benchmarks;
- It strikes an appropriate balance between the objectives of protecting consumers
 from the potential for bidders to exercise market power, and not placing an
 excessive workload on market participants and RAs from having to respectively
 submit and review significant volumes of USPC applications.

The SEM Committee's proposal is to continue to set the ECPC at 0.5 times Net CONE (€46,150 / de-rated MW / year), and the Sterling equivalent using the indicative Annual Capacity Payment Exchange Rate from the Initial Auction Information Pack.

Any existing capacity with Net Going Forward Costs higher than the Existing Capacity Price Cap will retain the option to submit a USPC application to the RAs.

(f) the €/MW rate of the New Capacity Investment Rate Threshold:

The New Capacity Investment Rate Threshold ("NCIRT") is an amount determined by the RAs that must be exceeded by the cost per MW of constructing New Capacity for that capacity to be eligible to be allocated Awarded Capacity with a duration of more than one year.

New Capacity is eligible to bid to fix its Reliability Option for up to ten years. In order to do so, a capacity provider must meet a substantial financial commitment threshold. This threshold is known as the NCIRT.

The intention of setting the NCIRT is to ensure that only plant making a substantial financial commitment equivalent to the commitment for a new build plant is able to obtain a multi-year Reliability Option. Multi-year ROs should not be available to plant making a minor refurbishment. However, the threshold should not penalise investors who are able to build efficiently at low capital cost.

As described in the initial CRM parameters decision paper⁵, NCIRT for the first transitional auction was set at approximately 40% of the gross BNE cost, or €300,000 / de-rated MW. The BNE was re-evaluated in 2018 for the 2022/23 T-4 capacity auction. However, there was insufficient evidence to support a change in the NCIRT⁶. The SEM Committee therefore decided to retain the NCIRT at €300.000 / de-rated MW.

The SEM Committee proposes to retain the value of NCIRT at €300,000 / de-rated MW for the 2024/25 T-3 auction.

(g) the Annual Stop-Loss Limit Factor

The Annual Stop Loss Limit is the multiplier used to establish the annual stop-loss limit for Non-Performing Difference Charges from a Capacity Market Unit.

⁵ <u>SEM-17-022</u>, paragraph 7.2.18 ⁶ SEM-1<u>8-155</u>, <u>CY2022/23 Parameters Decision Paper</u>, paragraph 9.4.3.

A stop-loss is a cap on Reliability Option Difference Payments. Reliability Option Difference Payments are charges that must be paid by a generator during a scarcity event. The purpose of the cap is to limit risk on the generator and improve investability. However, a cap on RODPs means that there will be insufficient money to hedge suppliers, which has to be funded through the socialisation fund.

The stop-loss limit applies only to uncovered difference payments. It does not apply where the capacity provider has received revenue through the energy market to cover the difference payment.

Consider the example whereby a capacity provider has an annual stop-loss limit of €15,000 on an RO volume of 1MW, with the stop-loss limit based on uncovered difference payments. A RO strike price of €500/MWh is assumed. We also assume that there are two scarcity events, each of which lasts two hours, and during each the Administered Scarcity Price rises to €10,000/MWh.

During the first scarcity event, the generator has sold its 1MW of capacity in the energy market and receives $\le 20,000$ for its two hours of production. Under the Reliability Option, it must pay back $\le 19,000$ (2MWh * ($\le 10,000$ /MWh - ≤ 500 /MWh)) of this revenue in difference payments, and will therefore have net revenue of $\le 1,000$. Because the capacity provider had covered revenue from the energy market, the $\le 19,000$ does not count towards the stop-loss limit.

During the second event, the capacity provider was on forced outage, and has not sold any output. In the absence of a stop-loss, the capacity provider would have to pay the €19,000 in difference payments, without having any energy revenue to cover this cost. However, the stop-loss limit means that it only has to pay out up to a maximum of €15,000. There is therefore a €4,000 shortfall in RO difference payments. This shortfall is funded through the socialisation fund.

If the stop-loss had been based on all difference payments, the generator would have paid only €15,000 "stop-loss" on the first event and no payments on the second event. The total shortfall in RO difference payments across both events would be €23,000 instead of €4.000.

The stop-loss limit applies to the annual option fee. To date in the capacity market, the Annual Stop-Loss Limit Factor has been set at 1.5.

The SEM Committee propose to continue to apply an Annual Stop-Loss Limit Factor of 1.5 to Awarded Capacity allocated in the 2024/25 T-3 auction.

(h) the Billing Period Stop-Loss Limit Factor;

The Billing Period Stop Loss Limit Factor is a multiplier used to establish the billing period stop-loss limit for Non-Performance Difference Charges from a Capacity Market Unit.

The purpose of stop-loss limits is described above. The purpose of the Billing Period Stop Limit Factor is to limit the level of losses in any one Billing Period (week).

If there were no Billing Period Stop Loss Limit Factor, and there were a number of scarcity events at the start of the Capacity Year so that a capacity provider reached its Annual Stop Loss Limit, that capacity provider would have a reduced incentive to maximise its availability for the remainder of the capacity year. By limiting the losses that can apply in any one Billing Period, the incentive to remain available for the remainder of the Capacity Year is maximised.

The Billing Period Stop Loss Limit Factor is currently 0.5⁷. The SEM Committee proposes to retain this value for Awarded Capacity allocated in the 2024/25 T-3 capacity auction.

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⁷ Note: in the parameters decision paper for the first capacity auction (<u>SEM-17-022</u>), the SEM Committee decided that the Billing Period Stop-Loss Limit should be 50% of the Annual Stop-Loss Limit. Because the Annual Stop-Loss Limit Factor was set to 1.5, the Billing Period Stop-Loss Limit Factor was set to 0.75. However, because of the way the Annual and Billing Period Stop Loss Limit Factors interact within paragraph F.18.3.2 and F.18.3.4 of the Trading and Settlement Code, in order to achieve a relation of 50%, a Billing Period Stop-Loss Limit Factor of 0.5 is required.

(i) the indicative Annual Capacity Payment Exchange Rate;

The Annual Capacity Payment Exchange Rate is an exchange rate applicable to a Capacity Year which converts the Capacity Payment Price for a Primary Trade or a Secondary Trade from Euros to Sterling. This is determined by the System Operators using a methodology approved by the RAs.

Only the indicative exchange rate is calculated for the Initial Auction Information Pack.

This will be calculated immediately prior to its publication. The exchange rate will then be updated for inclusion in the Final Auction Information Pack.

 (j) the Increase Tolerance and Decrease Tolerance by Tolerance Class that may be applied by a Participant in its Application for Qualification to Capacity Market Unit de-ratings;

The Increase Tolerance is a percentage upwards tolerance that a Participant is permitted to apply to Capacity Market Unit de-ratings in an Application for Qualification. There may be different Increase Tolerances for different Technology Classes.

A Decrease Tolerance is a percentage downwards tolerance that a Participant is permitted to apply to Capacity market Unit de-ratings in an Application for Qualification. There may be different Decrease Tolerances for different Technology Classes.

CRM Decision 18 allowed for the possibility of tolerance bands to be applied to the unit-level De-Rating Factors determined for capacity providers. These tolerance bands would allow some flexibility in the level of participation required from dispatchable plant in the auction. This allowance was made in relation to mandatory participation; although all generators would still be required to participate. It would reflect the fact that not all generators of the same technology class have the same degree of reliability.

In the CRM Capacity Requirement and De-Rating Factor Methodology Decision paper⁹, the SEM Committee decided that, with the exception of DSUs, the tolerance bands will

⁸ SEM-15-103

⁹ <u>SEM-16-082</u>, paragraph 4.5.1

be set to zero for the transitional auctions, with the decision to be reviewed for the enduring auctions once the enduring value of Full Administered Scarcity Price has been determined.

The SEM Committee is proposing to retain this decision for the 2024/25 T-3 auction.

Technology Class	Increase Tolerance (%)	Decrease Tolerance (%)
All Except DSUs	0	0
DSUs	0	100

- (k) in respect of Performance Securities:
 - (i) the final Performance Security Posting Dates/ Events applicable to Awarded Capacity allocated in the Capacity Auction; and
 - (ii) for each Performance Security Posting Date/ Event, the final €/MW rate to be applied in setting Performance Securities applicable to Awarded Capacity allocated in the Capacity Auction.

A Performance Security is a security required as a condition of capacity award for Awarded New Capacity that has not reached Substantial Completion. A Performance Security Posting Date/ Event is a date or event from which a specified €/MW rate shall be applied to Awarded Capacity in setting Performance Securities. There may be multiple different Performance Security Posting Dates/ Events. The Performance Security Posting Dates / Events applicable to Awarded Capacity allocated in a Capacity Auction are determined by the Regulatory Authorities and provided to the System Operators.

In the parameters decision paper for the first capacity auction (SEM-17-022) the SEM Committee decided that all capacity is required to post a Performance Bond to cover 100% of its Termination Fee. The SEM Committee proposes to retain this policy, and therefore proposes that the Performance Security Rates should be as follows:

Date / Event	Performance Security Rate (€/MW)
More than 13 months prior to the beginning of the Capacity Year	10,000
From 13 months to beginning of Capacity Year	30,000
From beginning of Capacity Year	40,000

(I) the €/MW fee rates for calculating Termination Charges

A Termination Charge is a fee payable by a Participant where Awarded New Capacity is terminated.

The CRM detailed design decision paper 2¹⁰ noted that it is important that New Capacity is required to pay a Termination Fee if it fails to deliver capacity. The Termination Fee will be payable if the project:

- fails to deliver the Substantial Financial Completion milestones by the given date;
 or
- fails to achieve Substantial Completion by the Long Stop Date; or
- submits false or misleading information in the Qualification process.

For all capacity auctions to date, the Termination Charges have been set in accordance with the following table:

Date / Event	Termination Charge Rate (€/MW)
More than 13 months prior to the beginning of the Capacity Year	10,000
From 13 months to beginning of Capacity Year	30,000
From beginning of Capacity Year	40,000

¹⁰ SEM-16-022

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The SEM Committee proposes to retain these rates for the 2024/25 T-3 capacity auction.

(m) values for the Full Administered Scarcity Price and the Reserve Scarcity Price; and

The Administered Scarcity Price ("**ASP**") sets a floor on the Balancing Market price when a scarcity event occurs. The Full Administered Scarcity Price is the maximum value of the Administered Scarcity Price. The Reserve Scarcity Price Curve is a piecewise linear curve defining the relationship between the Reserve Scarcity price and the Short Term Reserve Quantity.

For the first two transitional auctions, Full ASP was set at the day ahead market price cap of €3,000/MWh. For the 2024/25 T-4 auction (held in January 2021), Full ASP was set at 25% of the Value of Lost Load ("VOLL"). It has been set at this value for all auctions since.

The SEM Committee proposes to retain setting the value of Full ASP in relation to VOLL. Specifically, Full ASP will be set to 25% of VOLL.

In the second CRM detailed design decision paper¹¹, the SEM Committee decided that the piece-wise linear function of ASP will be static, and the price from which the function begins will be the Reliability Option Strike Price.

However, the Reliability Option Strike Price is not strictly static. As described below, it is set in relation to monthly carbon, gas and oil prices, but has a floor price equal to the theoretical price of a Demand Side Unit (which in recent years has been set at €500/MWh).

The SEM Committee propose to set the price at which the piece-wise linear function of ASP begins at the floor of the Strike Price, as determined below. The Administered Scarcity Price will therefore be set in accordance with the following table:

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¹¹ SEM-16-022, section 6.4

Short Term Reserve (MW)	Administered Scarcity Price (€/MWh)
Demand Control	25% of VOLL
0	25% of VOLL
500	RO Strike Price

To clarify, ASP only applies when the available Short Term Reserve is less than the operating reserve requirement. If the operating reserve requirement is only 450MW, and the available Short Term Reserve falls to 490MW, the ASP function does not apply and prices will be market determined.

(n) anticipated values for the parameters to be applied in determining the Strike Price.

If the Market Reference Price exceeds the Strike Price, holders of Reliability Options must make Difference Payments.

The formula for the calculation of the monthly Strike Price (PSTR_m) is contained in the Trading and Settlement Code as follows:

$$PSTR_{m} = Max \left(\frac{1}{FTHEORYPU_{y}}\right) \times Max \left(PFUELNG_{m} + \left(PCARBON_{m} \times FCARBONING_{y}\right), PFUELO_{m} + \left(PCARBON_{m} \times FCARBONIO_{y}\right)\right), PTHEORYDSU_{y}\right)$$

where:

- FTHEORYPU_y is the Peaking Unit Theoretical Efficiency for Capacity Year, y;
- PFUELNGm is the Natural Gas Fuel Price for Month, m;
- FCARBONINGy is the Natural Gas Carbon Intensity Factor for Capacity Year, y;
- PFUELO_m is the Oil Fuel Price for Month, m;
- FCARBONIO_y is the Oil Carbon Intensity Factor for Capacity Year, y;
- PCARBON_m is the Carbon Price for Month, m; and
- PTHEORYDSUy is the Demand Side Unit Theoretical Price for Capacity Year, y, d.

This formula bases the Strike Price on the cost of a hypothetical low efficiency peaking unit, and includes a floor price on the strike price at the price of a theoretical demand side unit in €/MWh; this reflects the cost incurred by the DSU is switching off, which may not be related to the cost of energy.

The values of each of these parameters for each capacity auction to date were:

Strike Price Component	Value	Unit
PCARBON _m	PCARBON _m PCARBON _m Index	
PFUELNG _m	[PFUELNG _m Index (p/therm) x 0.01(£/p) + PFUELNG _m Trans port (£/therm)] x Exchange Rate (€/£) x 9.48 (therm/GJ) x 3.6 (GJ/MWh)	€/MWh
PFUELO _m	[PFUELO _m Index (\$/t) x Exchange Rate (€/\$) + PFUELO _m Transport (€/t)] x 0.025 (t/GJ) x 3.6 (GJ/MWh)	€/MWh
PCARBON _m Index	ICE ECX EUA Futures – EUA - (monthly) ¹²	€/tCO2e
PFUELNG _m Index	ICE UK Natural Gas Index (monthly)	p/therm
PFUELNG _m Transport	0.0424 ¹³	£/therm
PFUELO _m Index	Platt's Forward Curve (monthly) for monthly swap transactions for 1% sulphur free on board (FOB) fuel oil cargoes in North West Europe (NWE) for the relevant month (AAEGR00)	\$/t
PFUELO _m Transport	50 ¹⁴	€/t
FTHEORYPU _y	15	%
FCARBONING _y	0.202	tCO2e/MWh
FCARBONI NO _y	0.277	tCO2e/MWh
PTHEORYDSU _y	500	€/MWh
Exchange Rate (€/£)	The Trading Day Exchange Rate as defined in the Trading and Settlement Code	€/£
Exchange Rate (€/\$)	The rate set at 17:00 the day before the Trading Day, from the same source as used for the Trading Day Exchange Rate	€/\$
therm per GJ	9.48 ¹⁵	therm/GJ
LSFO calorific value	0.025 ¹⁶	t/GJ

The SEM Committee proposes to retain these parameter values for the 2024/25 CY2024/25 T-3 Auction.

¹² The December price for a given year will apply to all months falling within that year.

 $^{^{13}}$ NI natural gas transport adder used in I-SEM PLEXOS Forecast Model 2016-17.

 $^{^{14}}$ Based on ROI LSFO transport adder used in I-SEM PLEXOS Forecast Model 2016-17.

¹⁵ I-SEM PLEXOS Forecast Model 2017-17

¹⁶ I-SEM PLEXOS Forecast Model 2016-17

5. AUCTION FORMAT

Within the CRM design, a number of options were proposed for the Auction Format. The first two transitional auctions utilised Auction Format B: simple sealed bid with locational capacity secured to meet constraints being additional to that which clears the unconstrained auction. This was a transitional measure, with the intent to move to Auction Format D (full combinatorial) on an enduring basis.

As part of the State Aid process, the Regulatory Authorities gave an undertaking to the EC that from Capacity Year 2020/21 onwards, any capacity awarded out-of-merit Reliability Options for locational capacity constraint reasons should not be additional to the capacity secured in merit. Consequently, if out-of-merit volumes need to be procured to satisfy locational constraints, this will displace in-merit generation elsewhere.

Because of these State Aid commitments, the SEM Committee decided to utilise Auction Format C for the 2022/23 T-4 capacity auction. This is a simple sealed bid auction, with a heuristic based second step to offset additional locational capacity secured. This was also used for the 2020/21 T-1 auction, the 2021/22 T-2 auction, and the 2023/24 T-4 auction.

For the recently completed 2024/25 T-4 auction, which ran on 21 January 2021, Auction Format D was utilised. Auction Format D will also be used for the 2024/25 T-3 auction.

6. TREATMENT OF CONSTRAINTS

For the purposes of a Capacity Auction, a number of Locational Capacity Constraints Areas ("LCCA") can be determined by the System Operators. A Locational Capacity Constraint Required Quantity is the minimum de-rated capacity quantity that is required to satisfy the Locational Capacity Constraint.

For all capacity auctions completed ahead of the CY2024/25 T-4 Auction, there were two Level 1 LCCAs (Northern Ireland and Ireland) and one Level 2 LCCA (Greater Dublin, associated with the Ireland Level 1 constraint). A Level 2 LCCA for the rest of Ireland outside Greater Dublin was included for the 2024/25 T-4 auction. The SEM Committee proposes to retain this parameter for the 2024/25 CY2024/25 T-3 Auction.

The Capacity Auction is initially ran on an unconstrained (i.e. location agnostic) basis. If following the initial solution, any of the Locational Capacity Constraints has not been satisfied, additional capacity must be procured ¹⁷. This capacity will be procured on a pay-as-bid basis.

When procuring this additional capacity, New Capacity with an offered capacity duration of more than one year should be excluded. However, if there is insufficient capacity within an LCCA to allow the constraint to be met without it, this new, multi-year, Capacity must be considered.

For the 2024/25 T-3 capacity auction, the SEM Committee remains open to allowing the constrained element auction to solve using multi-year New Capacity.

A decision on this will be made prior to the publication of the Final Auction Information Pack, after the System Operators have provided the relevant information on LCCAs.

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¹⁷ Under Auction Format C and D, this constrained capacity can replace capacity that was used to satisfy the initial solution.

7. NEXT STEPS

Responses to the proposals within this consultation should be sent to Kevin Baron (Kevin.Baron@uregni.gov.uk) and Billy Walker (Billy.Walker@uregni.gov.uk) by 15 April 2021. We intend to publish all responses unless they have been marked confidential.

A decision on the parameter values will be published in May 2021 and the parameter values included in the Initial Auction Information Pack developed by the System Operators.