



Energy for
generations

ESB Response to SEM-20-029 Implementation of Regulation 2019/943 in relation to Dispatch and Redispatch

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General Comments

At ESB GT, we believe that electricity is an enabler of societal and economic well-being and that every citizen should have access to secure, sustainable and affordable electricity supplies. Since our establishment in 1927, we have worked to bring light and energy to the people of Ireland, allowing individuals and communities to fulfil their potential in whatever walk of life they are in. Today, we continue to drive progress and change, constantly innovating and evolving to stay relevant and reliable for the many people who depend on us in a dynamic and competitive market.

For us, it's not about short-term gains. We are driven by a desire to put in place solutions today that will leave a positive legacy for generations to come. We are harnessing all our resources for a brighter future, investing in our people and working collaboratively with partners to enhance the lives of our customers, drive economic progress and bring about a more sustainable future. We strive to be a safety leader in our industry, a world-class operator, a good corporate citizen and an employer of a smart, committed and healthy workforce. Through our diverse businesses across Ireland, Northern Ireland and Great Britain, we aim to meet the customer energy needs by bringing the best of our capabilities together to deliver innovative and value-driven solutions for a low-carbon world.

Over the past two years we have seen the market evolve faster than it ever has through the National Climate Action Plan, the new market rules, the increased technological shift and speed of adoption. The need for market designs to reflect this technology, scale and entry contestability is key to ensuring that the consumer benefits from the services of existing assets as well as incentivising new entry and investors. When looking to the future, as this consultation is, ESB GT is proud of its role in bringing the market to this point and hopes to continue to contribute to regulatory decisions that will underpin this new world of renewables and resilience.

ESB GT welcomes the opportunity to respond to the SEMC consultation on the implementation of Regulation 2019/943 in relation to Dispatch and Redispatch. In the consultation document and in discussions that have taken place across industry since its publication the focus has understandably been on the treatment of those categories of generation who will no longer qualify for priority dispatch.

However before considering the detail of how these categories of generation will operate in the market in the future it is worthwhile to considering how the fundamentals of the current SEM arrangements, as set out in 2014 high level design, align to the requirement of Article 12 and 13 of the recast Electricity Regulation.

Article 12 requires that the dispatching of units be non-discriminatory, transparent and, except for the treatment of priority dispatch units, market based. Similarly, under Article 13 the redispatching of units is required to be objective, transparent and non-discriminatory. The selection of units to be redispatched is again to be market based and redispatched units are to be financially compensated.



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In SEM both these dispatching and redispatching actions are achieved through the submission of Physical Notifications (PNs), detailing each unit's expected running, Technical Offer Data (TOD) detailing the ability of each unit to deviate from their submitted PN and Commercial Offer Data (COD) detailing the price at which they are willing to deviate from their PN position. TSOs utilise the submitted information along with further system information including a set of published system constraints to derive an economically efficient dispatch schedule for each of the units.

As noted in the consultation, as the dispatching and redispatching of units occurs within a single scheduling process undertaken by the TSOs, it would be challenging for the TSOs to determine whether a given action to deviate a unit from its submitted PN was undertaken as a dispatch, or in SEM terms, energy only action or as redispatch or non-energy action. To address this under the current SEM arrangements a ruleset has been developed as a subsidiary document to the Trading and Settlement Code, termed the Methodology for System Operator and Non-Marginal Flagging which sets out a mechanistic ruleset for the ex-post determination of an action's status as energy only or non-energy.

Through the submission of COD in SEM, units can provide two sets of pricing information to the Market Operator, simple offers formed freely by the participants based on their own view of expected prices and trading strategy and complex offers formed by participants based on a regulated bidding code of practice which requires these complex offers to be calculated based on the opportunity cost faced by the participant. Notwithstanding the concerns that ESB GT maintains in relation to the application of a regulatory bidding code of practice as an untargeted, preventative measure to mitigate local market power and the potential to negatively impact and confuse the formation of efficient market signals, the principle of recovery of opportunity cost has been a feature of the market for an extended period.

An action deemed to be energy only is typically associated with the unit's simple offer and can go on to be imbalance price setting and the related volume settled at the imbalance price. An action deemed to be non-energy is associated with the unit's complex offer, it is not price setting and the related volume is settled at the better of the imbalance price and the complex offer price.

In this way ESB GT believes the current SEM arrangements meet the requirements of Article 12 and 13 by ensuring both processes are non-discriminatory, transparent and market based and where redispatch units are compensated to the level of their opportunity costs. In ESB GT's view at the highest level what is required for the implementation of Regulation 2019-943 is that the principles underlying these current market arrangements be extended to those categories of generation that would heretofore have been given priority dispatch status.

Further ESB GT believes that a close adherence to, and timely implementation of the requirements of the Regulation 2019/943 will best allow for the required investment in renewable generation to meet the decarbonisation ambitions in both jurisdictions and ensure the efficient operation of the SEM market as further detailed below.



Grandfathering of Priority Dispatch

ESB GT supports the option proposed in the consultation to limit the interpretation of “Without prejudice to contracts concluded before 4 July 2019” under Article 12 as; a unit which becomes active under a contract concluded before 4 July 2019 such as a REFIT letter of offer or executed commercial PPA. It is considered that this option limits the grandfathering provisions of Article 12 to those developers would have made significant investments in the delivery of their projects and who had a route to market with fixed commercial terms and finalised financing arrangements in place at the time the Regulation came into force.

ESB GT supports the proposal for grandfathering under Article 12 to be extended to projects which become active under a contract concluded before 4 July 2019 such as a REFIT letter of offer or executed commercial PPA.

Non-Priority Renewable Generation

Article 12 ends the provision of priority dispatch to all but the smallest renewable generators who fall outside the grandfathering provisions. The categories of generators who heretofore would have been given priority dispatch status are expected and should be able to benefit from full participation in the market on an equivalent basis to all other categories of non-priority generation currently operating in SEM. This includes the submission of a PN based on their ex-ante market position which in the absence of an energy only or non-energy action by the TSO will be reflected in the dispatch. They should be required to fully participate in the balancing market and submit TOD and COD which the TSO will apply, unaltered, in the generation schedule process. They should have the option to submit two sets of pricing information, simple and complex. The simple pricing information, where relevant, being potentially pricing setting and the complex pricing adhering to the principle of opportunity costs and applying where TSO actions are deemed to be non-energy.

For example, a firm non-priority renewable generator in this position could be scheduled below the level of their submitted PN to allow priority generation to operate at the level of their availability based on their submitted COD. The resulting TSO actions being deemed as non-energy and settled at the better of the submitted complex offer and the imbalance settlement price. In this way a firm, non-priority renewable generator that has competed and earned a position in the ex-ante markets will be protected against the impact of TSO actions in the same way and to the same extent as all other categories of non-priority generation and in line with the high-level design.

Alternatively, non-priority renewable generation that competes in the ex-ante markets and fail to earn a position would submit a PN of zero and in the absence of being scheduled above this level by

the TSO based on it submitted COD, would be dispatched to zero regardless of its level of availability, again in line with the treatment of all other generation and the high level design.

ESB GT believes the ending of priority dispatch requires facilitation of full participation in the market by renewable generation. The TSOs and MO should, under the direction of the SEMC, begin the programme of work to enable this participation immediately.

Treatment of Constraint vs Curtailment

As alluded to above ESB GT believes that for non-priority dispatch renewable generation the key distinction is in the nature of actions taken by the TSO against the unit's submitted PN i.e. whether an action was energy only or non-energy rather than whether the system constraint that gave rise to the action was a local network constraint or a system wide constraint.

The delineation between energy only or non-energy for non-priority renewable generation would require amendments to the Methodology for System Operator and Non-Marginal Flagging to reflect the system constraints actions against these units would be applied to resolve. The bidding code of practise and the related requirement to relate complex bids to a unit's opportunity cost is structured to mitigate said local market power. For a non-priority renewable generator, the same principal would apply limiting the complex bids to the value foregone in the case of TSO non-energy actions.

ESB GT believes that all actions taken against a PN submitted by a non-priority renewable generator, as they are determined and settled against a price submitted by that generator, are market-based for the purposes of Article 13. By contrast, actions taken by the TSO against the PNs of priority dispatch generation are not determined or settled against a price submitted by the generator. Instead this is applied only once all market-based options are exhausted and the determination by the TSO of which priority dispatch units to act against that is based on their location, in the case of

ESB GT believes once renewable generation is fully active in the market all actions taken against its submitted PN by the TSO should be deemed market based. By contrast all actions taken against priority dispatch generation who do not submit COD are non-market based.

constraints, and the pro-rata ruling, in the case of curtailment. Therefore, ESB GT believes all actions taken against priority dispatch generation are non-market redispatch based for the purposes of Article 13.

Compensation

It follows from the above that all actions taken against the PNs of firm, priority generation qualifies for the financial compensation provided for under Article 13(7). ESB GT believes that the level of



financial compensation set out under Article 13(7) is analogous to that provided for under the bidding code of practise and is effectively a restatement and reaffirmation of the opportunity cost principle for units deemed to be serving a system constraint.

For example, for an ex-ante traded firm priority dispatch generator that is redispached down by the TSO is provided by Article 13(7)(b) financial compensation up to the net revenue from the sale of electricity on the day ahead market including any available financial support that the unit would have earned had it not been redispached. If the same unit was non-priority dispatch the basis of its complex offer would be the opportunity cost in being redispached as defined in the bidding code of practise as the benefit foregone.

ESB GT strongly disagrees with the position in the consultation that providing the compensation as set out under 13.7 (b) to firm priority dispatched generation that is redispached results in excessively highly compensation, as the provision under 13(7)(b) is reflectively only of the unit's opportunity cost and in line with the market design for all other categories of firm generation when subject to non -energy actions by the TSO.

Interim Measures

ESB GT understands that there are likely to be significant changes required to TSO's systems and processes as a result of the implementation of Regulation 2019-943 to allow full participation in the balancing market for non-priority dispatch wind with the resulting programme of work likely to span several years.

While ESB GT appreciates the complexity of the systems and processes in question and the resource and time constraints faced by the TSOs this does not belie the fact that the Regulation is in force. As such ESB GT believes that once the principles of the implementation are decided there will be an urgent need to progress interim measure to ensure that market participants are not commercial disadvantage due to a delayed implementation.

ESB GT strongly believes interim measures will be urgently required to protect market participants who are commercially disadvantaged due to the delayed implementation of the Regulation.

Out of Market Generation

ESB GT believes that out of market generation is an area that warrants some further consideration. In SEM there is a significant volume of out of market deminimus generation that have Grid Code or Distribution Code requirements to be controllable by the SOs. Given the end of priority dispatch there is a question as to what treatment new units in this category should be given.



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Arguably, as these units are not required to participate in the market and therefore are not required to communicate their TOD and COD to the market operator, they should be exempt from dispatch and redispatch actions by the TSO. However, this would result in these units being afforded higher than priority dispatch status which would be counter to the intent of the grandfathering provision in the regulation.

Alternatively, they could be deemed to be available only for non-market based dispatch with a lower priority than grandfathered priority dispatch units. However, this would likely require an out of market mechanism to allow the TSOs to provide the compensation provided for under Article 13(7) to these units, this risks a requirement to develop a market outside the existing market to affect the payment of this compensation.

Another option could be to align the de minimus level of the market to the applicable controllable criteria of the SOs so that all non-priority generation, with the capability to be controlled, is brought into the market either as an individual unit or as part of an aggregated generation unit. However, this would likely impose an element of cost on relatively small generators.

ESB GT believes further consultation on the treatment of controllable, out of market non-priority dispatch generation is required.

Summary

In summary ESB GT considers that the consultation has usefully begun a conversation across industry on the implementation of Regulation 2019-943 and related ending of priority dispatch for all but the smallest renewable generation units. While ESB GT believes the requirements of the Regulation are clear, the detailed design of the related systems and processes will take significant further engagement across industry. While ESB GT is mindful that the Regulation is in force it is believed that there are areas where further consultation would be welcome such as the treatment of out of market, non-priority, controllable generation.

Below we have sought to answer the specific questions raised in the consultation paper, if you have any questions in relation to the points raised in this response please do not hesitate to contact me.

Regards,

William Carr

Regulation,

ESB Generation and Trading



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Consultation Questions

Question 1: Do you agree with the RAs' interpretation of the requirements under Articles 12 and 13 and specifically the application of dispatch, redispatch and market based/non-market based redispatch in the SEM?

No, in ESB GT's view all actions by the TSOs against the submitted PNs of non-priority dispatch renewable generation are market based with the categorisation of dispatch and redispatch being determined through an ex-post ruleset captured in an updated version of the Methodology for System Operator and Non-Marginal Flagging.

Also, ESB GT is strongly of the view actions taken by the TSO against the PNs of priority dispatch generation are not determined or settled against a price submitted by the generator. Instead the determination of which units to act against by the TSOs is based on their location in the case of constraints and the pro-rata ruling in the case of curtailment. Therefore, ESB GT believes all actions taken against priority dispatch generation are non-market based for the purposes of Article 13.

Question 2: In terms of the practical implementation of Article 12(1) to introduce a distinction between units which retain eligibility for priority dispatch and those which are not eligible, the RAs propose;

Where a commissioning programme has been agreed with the TSOs on or before 4 July 2019, it is proposed that such units will be eligible for priority dispatch.

Where a unit is eligible to be processed to receive a valid connection offer by 4 July 2019, the RAs are of the view that this represents a contract concluded before priority dispatch ceases to apply under Article 12 and that such units are also eligible for priority dispatch.

Where a unit becomes active under a contract concluded before 4 July 2019 including a REFIT letter of offer or PPA, the RAs welcome feedback on the proposal for such generators to be eligible for priority dispatch

Interested stakeholder's views are invited on these proposals.

ESB GT supports the proposal that where a unit becomes active under a contract concluded before 4 July 2019 including a REFIT letter of offer or PPA such generators to be eligible for priority dispatch. ESB GT believes that this proposal strikes an appropriate balance between extending the grandfathering provisions of Article 12 to those developers would had made significant investment in the delivery of their projects and who had established a clear route to market with fixed commercial terms and financing arrangement in place at the time the Regulation came into force and adhering to the ending of priority dispatch after the 4th July 2019.



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Question 3: It is the RAs' understanding that any unit which is non-renewable dispatchable but is no longer eligible for priority dispatch can be treated like any other unit within the current scheduling and dispatch process, through submission of PNs with an associated incremental and decremental curve. Feedback is requested on this aspect of implementation of Article 12 of the new Electricity Regulation.

ESB GT strongly supports this position, Article 12 ends the provision of priority dispatch to all but the smallest renewable generators who fall outside the grandfathering provisions. The categories of generators who heretofore would have been given priority dispatch status are expected and should be able to benefit from full participation in the market on an equivalent basis to all other categories of non-priority generation currently operating in SEM with all the attendant responsibilities, liabilities and protections.

Question 4: It is proposed that any unit which is non-dispatchable but controllable and is no longer eligible for priority dispatch would run at their FPN, be settled at the imbalance price for any volumes sold ex-ante and could set the imbalance price.

ESB GT supports this position, subject to the clarification that the imbalance price would be applied to any volumes generated but not traded in the ex-ante markets.

Question 4 (continued): As part of this proposal, there is a question of whether such units would be required to submit FPNs or where no FPN is submitted, the unit could be assigned a deemed FPN calculated by the TSOs as per the process today. Where a unit elects to submit an FPN, in this case, the TSOs would be required to use this as long as it does not deviate above a certain percentage of the TSOs' own forecast availability of the unit.

ESB GT does not support this position. It is not aligned to the principal of balance responsibility and would result in costs being created and socialised. The Regulation does not make distinctions between different types of non-priority generation based on their capacity. Whether smaller units are potentially faced with costs resulting from participating in the market their participation can be facilitated and these potential costs minimised using aggregated generation units.

Question 4 (continued): As an alternative or as a possible interim measure, taking account of the zero marginal cost nature of non-dispatchable but controllable generation in the market today, i.e. wind, solar, units no longer eligible for priority dispatch could be scheduled to their availability as



per the process today on the assumption that this reflects economic dispatch in any case, but where there is excessive generation on the system such units would be subject to energy balancing prior to any priority dispatch units.

ESB GT does not support this position or agree that all non-dispatchable but controllable generation will necessarily have zero marginal costs given the potential developments around the nature of maintenance contracting. ESB GT believes the role of the market would be undermined if the TSO were to be required to treat non-priority dispatch generation as if it were priority dispatch with the potential to distort the efficient scheduling of flows across the interconnectors. It is not clear that this proposal would be in line with the end of priority dispatch under the Regulation or align with the design of the RESS scheme. Under the RESS scheme a supported project will not benefit from support in period where the market reference price is less than zero. If the TSO were to schedule RESS projects to their availability they would be exposed to negative prices with no recourse to RESS.

Question 5: Feedback is invited from interested stakeholders on the treatment of non-dispatchable and non-controllable units.

ESB GT believes that where in a SEM context a unit has designated a non-dispatchable and non-controllable these do not have a requirement to respond to instructions from the TSOs and as such can not be dispatched or redispatched. Therefore, the requirements of Article 12 and 13 do not apply to these units.

Question 6: Do you agree with the RA's interpretation that new generators which are no longer eligible for priority dispatch (both dispatchable and non-dispatchable but controllable) will be subject to energy balancing actions by the TSOs, considered in dispatch economically and settled like any other instance of balancing energy?

ESB GT strongly supports this position and considers that is a direct implication of the end of priority dispatch under Article 12.

Question 7: What is your view on the application of bids and offers to zero marginal cost generation?

ESB GT does not believe that bids should, nor can be prescribed, for any participant in a market. ESB GT believes that non-priority renewable generation should have the option to submit two sets of pricing information, simple and complex. The simple pricing information where relevant being potentially imbalance pricing setting and the complex pricing adhering to the principle of opportunity cost and applying where TSO actions are deemed to be non-energy.



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Question 8: What is your view on a potential rule-set being implemented for non-dispatchable units where (a), systems cannot facilitate ranking of decremental bids for such units for balancing actions for a certain time period and/or (b) where convergent bid prices require a tie-break rule?

In ESB's view the current state of the TSO's system and process should not be a factor in a fundamental market design decision. Were the situation to arise where a significant number of market participant submit convergent bids to the Balance Market a pro-rata treatment could be applied as per the current rules in the day ahead market.

Question 9: Do you agree with the TSOs' proposal for a revised priority dispatch hierarchy?

ESB GT does not believe that the implementation of Regulation 2019/943 necessitates the revision of the priority dispatch hierarchy other than to confirm that it is aligned with the requirements of Article (13)(6) with ESB GT believes to be the case. While a revision to the hierarchy could be beneficial in the context of changes to the priority dispatch generation portfolio it is believed that this would be best address through a separate consultation process.

Question 10: Feedback is requested from interested stakeholders on the types of demonstration projects that may be suitable for an application process for limited priority dispatch eligibility

No additional comments

Consultation Question 11: The RAs' interpretation of the Regulation is that where a new connection agreement is required or where the generation capacity of a unit is increased, a unit will no longer be eligible for priority dispatch.

The RAs also propose that units should be able to make a choice on whether they wish to retain their priority dispatch status or not. Feedback is requested on this proposal.

ESB supports the proposal that units should be able to make a choice on whether they wish to retain their priority dispatch status or not. ESB GT understands that there are likely to be significant changes required to TSOs system and processes as a result of the implementation of Regulation 2019-943 to allow full participation in the market for non-priority dispatch wind with resulting programme of work likely to span several years to complete. While ESB GT appreciates the complexity of the systems and processes in question and the resource and time constraints faced by the TSOs this does not belie the fact that the regulation is in force. As such ESB GT believes that once the principles of the implementation are decided there will be an urgent need to progress interim measure to ensure that market participants are not commercial disadvantage due to a delayed implementation.



Question 12: Do you agree with the RAs' interpretation of Article 13(5)(b) whereby downward redispatching of electricity produced from renewable energy sources or from high-efficiency cogeneration (i.e. the application of constraints and curtailment) regardless of priority dispatch status, should be minimised in the SEM? Under this interpretation, the only difference between renewable generators and HECHP eligible for priority dispatch will be how they are treated in terms of energy balancing.

ESB GT agrees that Article 13(5)(b) places an obligation on the System Operators to minimise the downward redispatch of renewable generation. However, it is not considered that this intercedes with the requirement under Article 13(2) for the selection of resource for redispatch to be market based.

Article 13(5) places significant obligations on the System Operators to consider the level of redispatch of renewables in the development of the network. ESB GT would welcome further information on how these obligations will be reflected in the incentivisation mechanisms applicable to the System Operators.

Question 13: Do you agree with the RAs' interpretation of Article 13(6) and the introduction of a new hierarchy for the application of non-market-based downward redispatching?

ESB GT does see a distinction between the existing priority dispatch hierarchy and the requirements of Article 13(6).

Question 14: Do you agree with the RAs' interpretation of Article 13(7) and the view that the provision of financial compensation to firm generators subject to curtailment based on net revenues from the day-ahead market including any financial support that would have been received represents an unjustifiably high level of compensation?

ESB GT strongly disagrees with the position in the consultation that providing the compensation as set out under 13.7 (b) to firm priority dispatched generation that is redispatched results in excessively high compensation as this is reflective only of the unit's opportunity cost and in line with the market design for all other categories of firm generation when subject to non-energy actions by the TSO.

In ESB's view the reference with Article 13(7) to unjustifiably low or unjustifiably high compensation is directly related to the relative financial position of the generator who has been subject to redispatch in a scenario where the redispatch had not been applied compared to the situation after the redispatch had been applied. The Article seeks to ensure that the generator is not negatively commercially penalised by the application of non-market based redispatch.



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Article 13(7) makes no reference to the application of a forecast aggregate cost of this compensation in determining if it should be made available. While ESB is mindful of the statutory duties of the Regulatory Authorities to consider the final customer when applying discretion in their decision-making processes ESB GT it is not clear that this discretion exists in the implementation of the requirement of directly applicable Regulation.

Question 15: Which of the options on compensation for curtailment presented above do you view to be most appropriate to adopt in the SEM? Are there additional options that the RAs should consider around compensation for curtailment?

ESB GT believes that the implementation of Article 13(7) and the provision of compensation to the level set out in Article 13(7)(b) would not result in unjustifiably high compensation to firm generators subject to non-market based redispatch.