



Single Electricity Market (SEM)

Updated Roadmap to Clean Energy Package Implementation

Information Paper

SEM-20-089

15 December 2020

EXECUTIVE SUMMARY

In 2018 and 2019 the EU adopted the Clean Energy for all Europeans Package (CEP). One of the legislative files of the CEP, the Regulation on the internal market for electricity (EU) 2019/943 (the 'Regulation') seeks to update requirements around the functioning of the EU wholesale electricity markets.

The SEM Committee conducted an article-by-article review of the Regulation in 2019 in conjunction with the Government Departments to identify areas where further work was needed to ensure compliance with its requirements. An Information Paper entitled "Roadmap to Clean Energy Package Implementation" ([SEM-19-073](#)) was published in December 2019 by the SEM Committee following that review, which identified six areas of work that the Regulatory Authorities (RAs) needed to progress in 2020. The six areas included,

- Balance Responsibility and Aggregation (Articles 5, 6, and 7)
- Priority Dispatch (Article 12)
- Redispatch (Article 13)
- Market Parameters (Articles 7, 8, 10, 11, 23, and 27)
- Capacity Remuneration Mechanism (Articles 20, 22, 26, and 27)
- Regional Coordination Centres (Article 35 and 36)

Throughout 2020 the RAs conducted further reviews into each of these areas and published a number of Information Papers, Consultation Papers and Decision Papers to progress the implementation of the requirements outlined in each of these Articles. This also included the identification of another workstream on the procurement of Balancing Capacity under Article 6 of the Regulation.

The RAs are of the view that a significant volume of work has been progressed in 2020, but that some of these workstreams will continue into 2021, due to either the complexity of the topic or delays caused by unforeseen circumstances. The following table sets out the remaining work and anticipated timelines for each of these deliverables which the RAs will be progressing throughout the 2021.

Deliverable	Steps to Implementation
Priority Dispatch and Redispatch	<ul style="list-style-type: none">• A further Consultation Paper on Non-Market Based Redispatch and Compensation Pursuant to Regulation (EU) 2019/943 (Q1 2021). This has been revised from a Proposed Decision paper as the RAs require

	<p>further feedback on a number of options before coming to a minded to position. A Decision Paper on this topic is then anticipated (Q2 2021).</p> <ul style="list-style-type: none"> • A Proposed Decision on treatment of new renewable units in the SEM (Q1 2021). This will be followed by workshops with the TSOs and SEMO in order to facilitate the timely development of systems to accommodate these changes, and also a Decision Paper is planned on treatment of new renewable units in the SEM (Q2 2021). • A Consultation Paper on Priority Dispatch Hierarchy (Q1 2021) and subsequent Decision Paper (Q2 2021).
Market Parameters	<ul style="list-style-type: none"> • Procurement of Market Experts to aid in the assessment needed to calculate VoLL, • Conduct consumer survey based on ACER approved methodology to determine VoLL for the SEM, • Review of the current Cost of New Entrant parameter in the context of the new ACER calculation methodology, • Calculation of the Reliability Standard using the new VoLL and CoNE parameters.
Regional Coordination Centres	<ul style="list-style-type: none"> • Engage in further discussions with other RAs and the European Commission to determine the best approach to establish RCCs (Q1 2021), • Provide a Decision to approve or a request for amendment of the TSO Proposal (Q1 2021), • In the case of a request for amendment, the IU RAs will continue to engage with the IU TSOs on the progress and development of the proposal (Q1/Q2 2021).
Balancing Capacity	<ul style="list-style-type: none"> • Consultation on future arrangements for system services (Q1 2021), • Decision on future arrangements for system services (Q2/Q3 2021).

This paper is being provided primarily for information; however, any comments on the workplan outlined in the table above or on any aspects of the Regulation which should be considered by the RAs is welcomed from interested stakeholders and industry participants. Comments or questions can be sent to either Heather Pandich at hpandich@cru.ie or Ian McClelland at Ian.McClelland@uregni.uk.gov.

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1. INTRODUCTION

In 2018 and 2019 the EU adopted the Clean Energy for all Europeans Package (CEP). The CEP consists of eight legislative acts with the aim to facilitate a transition in the EU towards cleaner energy. One of the legislative files, the Regulation on the internal market for electricity (EU) 2019/943 (the 'Regulation') seeks to update requirements around the functioning of the EU wholesale electricity markets.

The SEM Committee conducted an article-by-article review of the Regulation in 2019 in conjunction with the Government Departments to identify areas where further work was needed to ensure compliance with the its requirements. It was established that some of the work areas were primarily driven by the Departments, the preparation and submission of Implementation Plans under Article 20 for example; some of the Articles were targeted at actors outside the SEM, such as Article 14 which is targeted at the NEMOs; and some presented areas for further work by the SEM Committee in considering the market's alignment with the Regulation. An Information Paper entitled "Roadmap to Clean Energy Package Implementation" ([SEM-19-073](#)) was published in December 2019 which identified six areas the Regulatory Authorities (RAs) needed to progress in 2020.

The six areas included,

- Balance Responsibility and Aggregation (Articles 5, 6, and 7)
- Priority Dispatch (Article 12)
- Redispatch (Article 13)
- Market Parameters (Articles 7, 8, 10, 11, 23, and 27)
- Capacity Remuneration Mechanism (Articles 20, 22, 26, and 27)
- Regional Coordination Centres (Article 35 and 36)

Throughout 2020 the RAs conducted further reviews into each of these areas and published a number of Information Papers, Consultation Papers and Decision Papers to progress the implementation of the requirements outlined in each of these Articles.

This Information Paper is being published to summarise for interested stakeholders the work done to date on the implementation of these deliverables, and to outline, at a high-level, the plan to continue implementation into 2021 on some of the remaining workstreams.

2. WORK COMPLETED IN 2020

Throughout 2020, the RAs engaged with stakeholders, published Information Papers, Consultations and Decisions on the various aspects of the Regulation. The sections below breakdown the work done on each of the workstreams highlighted in SEM-19-073.

2.1 BALANCE RESPONSIBILITY AND AGGREGATION

The RAs originally planned to address the topics of balance responsibility and aggregation under one workstream. However, after reviews conducted in Q1 2020, it was determined that the workstream on balance responsibility would be able to be closed ahead of the work on the aggregation topic, and it was decided by the RAs to split the workstream and analyse each deliverable individually.

2.1.1 Balance Responsibility

A review was conducted at the beginning of 2020 to determine the SEM's compliance with Article 5 of the Regulation. This article provided requirements around balance responsibility, increasing the scope of market participants that had to be responsible for the imbalances they caused to the wholesale electricity markets.

Upon first review of the requirements, the RAs anticipated that the *de minimus* threshold for participation in the SEM may need to be lowered below 10MW to require participation by smaller generation facilities. There was an initial concern that units below this threshold could not be considered balance responsible because they were not actively participating in the market.

Through engagement with the TSOs and SEMO and further analysis, the RAs concluded that all generation facilities are required to be balance responsible through the current market arrangements which requires small generation units to contract with suppliers through power purchase agreements or supplier-lite arrangements. In these scenarios, the responsibility to be balanced is transferred to the entity with which the contract is agreed, meaning that for all generation produced there is an associated balance responsible party.

The RAs confirmed their views on compliance with this Article through the publication of an Information Paper on Balance Responsibility ([SEM-20-027](#)) in April 2020. This paper was primarily for information to express the RAs' views on the topic of balance responsibly, however it invited comments back from any interested participants. No comments were received, and the RAs continue to hold this view on compliance with Article 5.

2.1.2 Aggregation

Articles 6 and 7 of the Regulation outline requirements for market participants engaged in aggregation activities to have non-discriminatory access to the ex-ante and balancing markets. The RAs published a Consultation ([SEM-20-042](#)) to assess the current market arrangements to determine if aggregation was occurring already in some form in the SEM by existing market participants, and whether these entities had non-discriminatory market access.

The results of the Consultation concluded that Demand Side Units (DSUs), Aggregator Generator Units (AGUs), Assetless Suppliers (ASUs) and suppliers all conducted activities which could be considered aggregation as envisaged by the CEP. Additionally, all of these market participants have existing routes to market which were seen as non-discriminatory.

Based on the responses and the conclusion of the Review, the RAs determined that the existing market arrangements complied with the requirements on non-discriminatory market access for aggregators and published a Decision Paper confirming this view ([SEM-20-088](#)) in December 2020.

2.2 PRIORITY DISPATCH AND REDISPATCH

Articles 12 and 13 of the Regulation outline specific requirements on how units should be treated during the dispatching and redispatching processes. The requirements of Article 12 remove the right for certain units to be receive priority dispatch. The provisions of Article 13 detail how the redispatching process is to be market-based, and where non market-based redispatching occurs, units should be provided compensation for any losses incurred.

These requirements have proven to be complex to implement in the SEM due to the nature of the central-dispatch process being used by the TSOs. This contrasts other jurisdictions where self-dispatch is primarily used.

The RAs originally had viewed this as two individual workstreams, separately looking at requirements relating to the technical process of dispatch and redispatch and separately at compensation for non-market based redispatching. After further consideration it was decided to combine the two deliverables and address them together due to the considerable overlap between the two topics.

A Consultation Paper ([SEM-20-028](#)) on the implementation of Articles 12 and 13 of the Regulation was published in April 2020. Based on a significant level of detailed responses received, the RAs determined to progress each of the areas discussed in the Consultation

Paper as part of four separate workstreams, comprising further Consultation Papers, stakeholder workshops and Decision Papers. An Information Note ([SEM-20-052](#)) was published in August 2020 outlining the four key areas of work and the timelines under which they would be progressed in order to provide clarity to stakeholders.

Following on from SEM-20-052 a Decision Paper ([SEM-20-072](#)) outlining the feedback received to SEM-20-028 and the SEM Committee's response and decisions on Eligibility for Priority Dispatch and changes to Priority Dispatch status due to significant modifications was published in November 2020.

The RAs are now progressing a further detailed Consultation on the application of dispatch and redispatch in the SEM and financial compensation for non-market based redispatch, a Proposed Decision on the treatment of new units without priority dispatch in the SEM and a Consultation on the Priority Dispatch Hierarchy. As the Regulatory Authorities have further assessed responses and conducted analysis and drafting of each paper, the scope of these papers and timelines for publication have been amended from the August 2020 Information Paper. This updated roadmap aims to provide an overview of these changes. The RAs intend to publish these papers in Q1 2021, with subsequent Decision papers to follow in Q2 and Q3 2021.

2.3 MARKET PARAMETERS

There were several workstreams which were impacted under the market parameters deliverable. They were each related to the functioning of the wholesale markets and required updates to be made or reviews to be done on the existing parameters which underpin particular aspects of the SEM. Each of the individual workstreams are described below.

2.3.1 Technical Bidding Limits

There are requirements contained in Article 10 of the Regulation stating that there shall be no restrictions to the formation of the wholesale prices, however, NEMOs may apply harmonised limits on the maximum and minimum clearing prices for ex-ante markets, such that they do not unnecessarily restrict trade and they take the Value of Lost Load (VoLL) into consideration.

The review of the SEM with regards to this requirement highlighted that although there were price caps in place in the wholesale markets, the limits which were applied were considered unrestrictive and they were set with the VoLL taken into consideration.

Information notes were drafted and provided to the Department for Environment, Climate and Communications (DECC) in Ireland and the Department for the Economy (DfE) in Northern Ireland to confirm compliance with the requirements in Article 10 in December 2019.

In 2019, the Regulatory Authorities also provided support to DECC and DfE in the development of separate Implementation Plans for Ireland and Northern Ireland pursuant to Article 20 of the Regulation, which requires Member States with identified resource adequacy concerns to develop and publish an implementation plan with a timeline for adopting measures to eliminate any identified regulatory distortions or market failures as part of the State Aid process. These were required to consider price caps in accordance with Article 10. Both Implementation Plans were consulted on by the European Commission and the Regulatory Authorities provided support to both Departments to submit revised plans following the Commission's Opinion published in respect to each plan.

2.3.2 ISP Exemption Work

Articles 7 and 8 of the Regulation place responsibilities on the TSOs and NEMOs to effectively organise and manage the ex-ante market to maximise the efficiency of the market and create a fair and non-discriminatory trading platform. To facilitate this, Article 8 requires harmonisation of the imbalance settlement period (ISP) to be shortened to 15 minutes by 1 January 2021 unless a derogation or exemption from this requirement is requested by the regulatory authorities before the end of 2020.

The RAs' preferred position is to follow a process outlined in Article 53 of the Guideline on Electricity Balancing (the "EBGL Regulation") to provide an exemption from this requirement. The exemption is for a period of three years and based on a cost-benefit analysis undertaken in conjunction with ACER.

Having shared and agreed proposed project timelines with ACER, a questionnaire was published in August 2020 in order to gather the necessary information from stakeholders to feed into the cost-benefit analysis. Preliminary results from this analysis have now been obtained by the RAs and shared with ACER.

A series of detailed discussions have taken place between the parties with further analytical work being proposed to provide additional scrutiny of the indicative results.

Once the results have been finalised and the appropriate endorsement of the results secured from ACER, the outcome of the process will be communicated to industry.

2.3.3 Market Parameters for Resource Adequacy Assessment

The Regulation also sought to harmonise the way that Member States calculate certain market parameters to assess resource adequacy when considering the introduction of a capacity mechanism. Article 23 outlined the requirement for a new calculation methodology to be developed to compute technical parameters such as the Value of Lost Load (VoLL), Cost of New Entrant (CoNE) and the Reliability Standard.

These new calculation methodologies were required to be developed by ENTSO-E and approved by ACER to then be applied regionally in each bidding zone. Article 11 outlines the timelines and provisions on how to apply VoLL in each jurisdiction, and Article 25 does the same for the Reliability Standard.

The original timeline in the Regulation anticipated the new calculation of VoLL to be incorporated into the SEM by July 2020, however due to delays beyond the RAs control at ACER and ENTSO-e level, the approval of the calculation methodologies was delayed until October 2020, which resulted in a delay of the regional calculations. The RAs, however, were heavily engaged on the discussions at NRA level and with ACER around the approvals to ensure the SEM's point of view was provided for in the Decision.

The new deadline for the calculation of VoLL was communicated by ACER to be January 2021. The implementation of this updated market parameter by that deadline would entail extensive work to be progressed in a rapid manner. The RAs aim to ensure the most efficient and effective market analysis is undertaken to calculate the VoLL. However, due to the amount of work needed to carry out this analysis, the RAs are anticipating that it will be challenging to comply with the January 2021 deadline.

In addition to these methodologies, Article 23 also required ENTSO-E to develop a methodology for the European Resource Adequacy Assessment (ERAA) which would be a standardised approach to assess resource adequacy concerns in each region. This methodology was also approved in October 2020 with input being provided on behalf of the SEM by the RAs.

The various methodologies which have been approved by ACER will be compared to assess the need for a Member State to have a capacity mechanism. The new methodologies for the calculation of the VoLL, CoNE and Reliability Standard aim to reflect the social and economic welfare of a Member State by taking actual consumer surveys into consideration in the calculations (such as the value that various categories of customers attribute to lost load). The VoLL and the CoNE are then used to calculate the Reliability Standard.

In contrast the ERAA methodology assesses a perfect market scenario, with limited social welfare taken into consideration.

The Reliability Standard from the social and economic analysis is then compared to the outcome of the ERAA. This comparison attempts to determine whether the social and economic scenario fulfils what is expected in a perfect market scenario. In simple terms if the social and economic reliability standard (measured in hours) is less than the reliability standard from the market scenario of the ERAA, then the member state requires a reliability standard in excess of that which the market will deliver without a capacity mechanism and it can be concluded that there is a resource adequacy concern and the Member State may need a capacity mechanism.

2.4 CAPACITY REMUNERATION MECHANISM

The Regulation aims to standardise not only the approach to assess the need for a capacity mechanism, but also to harmonise some of specifications in the design and participation required by capacity mechanisms. These updates required work to be undertaken by the RAs to comply with the requirements set out in the Regulation.

2.4.1 Emissions Limits

Article 22 sets out new guidelines and design principles for the development of CRMs. The SEM was already compliant with many of the requirements due to the new market, which was implemented in October 2018, however, there was a new requirement which prohibits capacity payments for generation facilities emitting above a certain level of CO₂.

To address this updated requirement, the RAs published an Information Paper ([SEM-19-074](#)) in December 2019 to inform market participants of the interactions of the requirement and the T-4 Capacity Auctions for 2023/24. This paper was followed by a Consultation ([SEM-20-006](#)) on the Capacity Auction Parameters for the T-4 2024/2025 Auction and its interaction with the CEP requirements. A subsequent Decision Paper ([SEM-20-034](#)) was published in June setting out the RAs Decisions with regards to participation of generators emitting over the specified limit of CO₂. This was also published alongside a technical guidance note ([SEM-20-036](#)) outlining the technical requirements for determining CO₂ emissions for compliance with the CEP.

The RAs have been monitoring the impact of these documents following the publication of these decisions.

2.4.2 Cross-border Capacity Market Participation

The Regulation also contains requirements to open capacity market participation to other Member States, however the methodology to apply cross-border participation has been left to be developed by ENTSO-E and approved by ACER.

Article 26 of the Regulation specifies the requirements to be incorporated into the methodology, and the RAs have been engaging with ACER and feeding into their consultations and discussions on this topic. ACER consulted on the methodology in Q2 2020 and are in the process of determining a final decision on the requirements.

Due to the lack of interconnection with another Member States, however, post-Brexit, it is anticipated that this the requirements on cross-border participation in capacity mechanisms will not become relevant until such time interconnection is established with another Member State.

2.5 REGIONAL COORDINATION CENTRES

The final workstream which was identified in the 2019 CEP Implementation Roadmap related to the establishment of Regional Coordination Centres (RCCs). RCCs are intended to complement the role of TSOs in a system operation region (SOR). SORs were determined by an ACER Decision in April 2020 which was a result of a requirement of Article 36 of the Regulation.

The TSOs of each SOR were required to develop a proposal for the establishment of RCCs by July 2020 and were to provide this proposal to the RAs for approval. Following joint-RA approval, RCCs are to be established by July 2022.

The ACER Decision on SORs in April 2020 designated that the SEM and Great Britain make up the IU SOR. This resulted in a proposal being developed by EirGrid, SONI and NGENSO in Q2 of 2020, and was received by each of the RAs in July 2020. A Decision has yet to be determined by the RAs in the IU SOR and it is anticipated that this workstream will continue into 2021.

3. DELIVERABLES FOR 2021

Although there was much progress achieved on the deliverables in 2020, some work will progress in 2021 due to either the complexity of the topic or delays caused by unforeseen circumstances. This section sets out the remaining work and anticipated timelines for each of these deliverables which the RAs will be progressing throughout the new year.

3.1 PRIORITY DISPATCH AND REDISPATCH

Due to the complexity of the remaining areas outlined in SEM-20-052 and the requirements for further engagement and review, the RAs have set revised timelines to complete this work. The RAs acknowledge the need for clarity to be provided in many areas as soon as possible and are working to publish the next set of papers in the three outstanding areas as early as feasible in 2021. A significant amount of analysis and engagement has commenced on the remaining areas and the RAs intend to engage further with wider stakeholders in due course.

An overview of the remaining areas and the timelines for each are set out as follows;

- A further Consultation Paper on Non-Market Based Redispatch and Compensation Pursuant to Regulation (EU) 2019/943 (Q1 2021). This has been revised from a Proposed Decision paper as the RAs require further feedback on a number of options before coming to a minded to position. A Decision Paper on this topic is then anticipated (Q2 2021).
- A Proposed Decision on treatment of new renewable units in the SEM (Q1 2021). This will be followed by workshops with the TSOs and SEMO in order to facilitate the timely development of systems to accommodate these changes, and also a Decision Paper is planned on treatment of new renewable units in the SEM (Q2 2021).
- A Consultation Paper on Priority Dispatch Hierarchy (Q1 2021) and subsequent Decision Paper (Q2 2021).

It is envisaged that following completion of the Consultation and Decision processes set out above, a number of changes may be required to licences, Grid Codes, the Trading and Settlement Code, Balancing Market Principles Statement and market systems. Any such changes will be signaled in the Decision Paper on each topic.

3.2 MARKET PARAMETERS

Due to the delay in the approval of the calculation methodologies for the VoLL, CoNE and Reliability Standard, the RAs were not able to compute updated values for the SEM in 2020. Work has commenced on determining a strategy to apply the new methodologies to calculate these parameters for implementation into the SEM.

The RAs will engage with relevant stakeholders including Government Departments and the TSOs to determine a programme for the following in 2021;

- Procurement of Market Experts to aid in the assessment needed to calculate VoLL,
- Conduct consumer survey based on ACER approved methodology to determine VoLL for the SEM,
- Review of the current Cost of New Entrant parameter in the context of the new ACER calculation methodology,
- Calculation of the Reliability Standard using the new VoLL and CoNE parameters.

3.3 REGIONAL COORDINATION CENTRES

The RAs are currently engaging with other NRAs of the Central SOR and the European Commission to determine the scope of participation of third countries in RCCs to allow the IU RAs to finalise a decision on the TSOs' submission.

Further clarification on this matter is anticipated at the beginning of 2021, at which time, it is anticipated the IU RAs will be able to determine the best approach to either approving or requesting amendments for the RCC establishment proposal.

The timeline for the work is as follows;

- Engage in further discussions with other RAs and the European Commission to determine the best approach to establish RCCs (Q1 2021),
- Provide a Decision to approve or request for amendment of the TSO Proposal (Q1 2021),
- In the case of a request for amendment, the IU RAs will continue to engage with the IU TSOs on the progress and development of the proposal (Q1/Q2 2021).

3.4 PROCUREMENT OF BALANCING CAPACITY

Following the publication of the original Roadmap on CEP Implementation, the RAs continued to review the contents of the Regulation to ensure that all the various aspects of the Regulation were reviewed for compliance.

During these further revisions, the RAs identified that there were elements of Article 6 which related to the procurement of balancing services through a market-based system that required further work to be undertaken to implement the requirements.

The procurement of balancing capacity services was already being addressed by the members of the CRU and UR working on arrangements for future system services. The specifics of Article 6 were discussed with the DS3 team working on this topic and they incorporated the requirements of the CEP into their workstream.

In July 2020, the RAs published a scoping paper on considerations for the future arrangements for system services. The responses received will help formulate the basis for future Consultations and Decisions in this area.

For 2021, the RAs intend the following publications with regards to addressing procurement of balancing capacity;

- Consultation on future arrangements for system services, Q1 2021
- Decision on future arrangements for system services, Q2/Q3 2021.

4. SUMMARY AND NEXT STEPS

The table below summarises the work on the Regulation expected to be progressed by the RAs in 2021.

Deliverable	Steps to Implementation
Priority Dispatch and Redispatch	<ul style="list-style-type: none"> • A further Consultation Paper on Non-Market Based Redispatch and Compensation Pursuant to Regulation (EU) 2019/943 (Q1 2021). This has been revised from a Proposed Decision paper as the RAs require further feedback on a number of options before coming to a minded to position. A Decision Paper on this topic is then anticipated (Q2 2021). • A Proposed Decision on treatment of new renewable units in the SEM (Q1 2021). This will be followed by workshops with the TSOs and SEMO in order to facilitate the timely development of systems to accommodate these changes, and also a Decision Paper is planned on treatment of new renewable units in the SEM (Q2 2021). • A Consultation Paper on Priority Dispatch Hierarchy (Q1 2021) and subsequent Decision Paper (Q2 2021).
Market Parameters	<ul style="list-style-type: none"> • Procurement of Market Experts to aid in the assessment needed to calculate VoLL, • Conduct consumer survey based on ACER approved methodology to determine VoLL for the SEM, • Review of the current Cost of New Entrant parameter in the context of the new ACER calculation methodology, • Calculation of the Reliability Standard using the new VoLL and CoNE parameters.
Regional Coordination Centres	<ul style="list-style-type: none"> • Engage in further discussions with other RAs and the European Commission to determine the best approach to establish RCCs (Q1 2021), • Provide a Decision to approve or request for amendment of the TSO Proposal (Q1 2021),

	<ul style="list-style-type: none"> • In the case of a request for amendment, the IU RAs will continue to engage with the IU TSOs on the progress and development of the proposal (Q1/Q2 2021).
Balancing Capacity	<ul style="list-style-type: none"> • Consultation on future arrangements for system services (Q1 2021), • Decision on future arrangements for system services (Q2/Q3 2021).

In addition to the specific papers and workstreams mentioned above, the SEM Committee will continue to track progress towards implementation and will have regular meetings with Government Departments and interested stakeholders in relation to CEP implementation. As promised in the original CEP Implementation Roadmap Paper, the SEM Committee continues to commit to keeping stakeholders informed of all key developments in an open and transparent manner.

This paper is being provided primarily for information; however, any comments on the workplan outlined above or on any aspects of the Regulation which should be considered by the RAs is welcomed from interested stakeholders and industry participants. Comments or questions can be sent to either Heather Pandich at hpandich@cru.ie or Ian McClelland at Ian.McClelland@uregni.gov.uk.