

**Response to SEM-21-023**  
**Capacity Market Code WG18 Consultation Paper**  
**CMC\_02\_21**

**EirGrid and SONI Response**  
**04/05/2021**



# 1 Introduction

## 1.1 EirGrid and SONI

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

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

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

EirGrid and SONI have duties under licence to advise the CRU and UR respectively on matters relating to the current and expected future reliability of the electricity supply. We have also been allocated responsibility for administering the Capacity Market Code through our TSO licences. This response is on behalf of EirGrid and SONI in their roles as TSOs for Ireland and Northern Ireland.

## 2 EirGrid and SONI views on the Consultation Topic

EirGrid and SONI in our role as System Operators have considered the points raised during the Capacity Market Workshop 18<sup>1</sup> and in the SEM-21-023 consultation paper<sup>2</sup>, in relation to CMC\_02\_21 'Amendment to Capacity Market Code Modifications Workshop Agenda Timeline'<sup>3</sup>.

EirGrid and SONI support the intent of the proposed changes which will benefit the Code objectives by addressing a minor non compliance issue and allow for a more efficient participation in Capacity Market Code Workshops.

A current minor non compliance occurs in that conflicting Capacity Market Code requirements state that an agenda is issued to all registered attendees the same time as the deadline for submission of new Modification Proposals.

All Modification Proposals must undergo an evaluation and publication process which the TSOs endeavour to complete as soon as possible and always within one working day of receipt of all Modification Proposals received; however, we cannot produce an agenda until the Proposals have been processed and verified.

The second issue that presents is that Capacity Market Code section B.12.7.1 F, states 'the System Operators shall circulate an agenda to Workshop participants at least 10 Working Days in advance of the Workshop.' The difficulty that this obligation presents is that this results in a short period of time for interested parties to register to attend. With the invitation issued one month in advance the current process only provides for a 2 week registration period.

Due to requests for registration after the deadline the TSO took a constructive decision to increase this registration period to allow for greater participation in Workshops. Increasing the registration period has allowed for greater participation in Workshops as the registration period is increased from two weeks to three weeks. The result of this change is that the agenda is now issued five working days, rather than ten working days in advance.

This is the timeline that the TSO are currently implementing, therefore Workshop attendees will see no change or difference to the service currently being delivered. The Workshop Agenda itself is a generic format with a standing order including hyperlinks to all Modifications raised. This Proposal seeks to align the timing of this administrative step of issuing the agenda to align with what is current practice. This will remove the non compliance issue and reflect current practice.

The question of the review period being shortened for Participants, was raised at Workshop 18 and in response to this the TSO advised that Modifications are publically available on the SEMO website after the submission deadline, almost two weeks in advance and this will not change with the introduction of this Proposal. This means that currently Proposals are

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<sup>1</sup> <https://www.sem-o.com/events/capacity-market-modificat-28/Capacity-Modifications-Committee-Workshop-18-Report-2.0.pdf>

<sup>2</sup> <https://www.semcommittee.com/publications/sem-21-023-capacity-market-code-wg18-consultation-paper-and-accompanying-documents>

<sup>3</sup> [https://www.sem-o.com/documents/market-modifications/CMC\\_02\\_21/CMC\\_02\\_21ModificationProposal-AgendaTimeline.pdf](https://www.sem-o.com/documents/market-modifications/CMC_02_21/CMC_02_21ModificationProposal-AgendaTimeline.pdf)

available to review up to two weeks in advance and that will remain the position and is not affected or changed by this Proposal.

The TSO will also undertake to include wording in the meeting invite highlighting that the Modifications Proposals raised will be published online with the relevant link to remind attendees as to when they will be able to review them. This invite is published in the Events calendar at [www.sem-o.com](http://www.sem-o.com) and is publically available.