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Capacity Market Audit

Independent Market Auditor's Report
For the period 1 May 2022 to 30 April 2023

Date 26 February 2025



Market Auditor Report – Notice re Distribution and Publication

This notice concerns the Market Auditor Report to the Commission for Regulation of Utilities (CRU) and the Utility Regulator (UR) (together the Regulatory Authorities (the RAs)) on the Capacity Market Audit for the 12 months ended 30 April 2023 dated 26 February 2025 (the "Report").

This notice does not apply to the RAs or Parties to the Code who have signed the "Terms of Release to the Parties to the Code" letter (including their employees acting within the scope of their employment duties).

The requirement for the Capacity Market Audit is set out in the I-SEM Capacity Market Code ("the Code") designated on 2 June 2017 and as amended from time to time. This Report was prepared by Deloitte Ireland LLP (a partnership established in Ireland and with its registered address at Deloitte & Touche House, Earlsfort Terrace, Dublin 2, Ireland) ("Deloitte").

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No work has been carried out since 02 September 2024 nor have any enquiries of RAs or the System Operator ("SO") been made since 25 February 2025. The Report does not incorporate the effects, if any, of any events or circumstances which may have occurred or information which may have come to light subsequent to that date. Deloitte makes no representation as to whether, had Deloitte carried out such work or made such enquiries, there would have been any material effect on the Report. Further, Deloitte has no obligation to notify you if any matters come to its attention after the date of this report which might affect the continuing validity of the comments or conclusions in the Report.

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1. Introduction

1.1 Background

The Code was first published on 2 June 2017, and subsequently updated to reflect any necessary amendments, and sets out the arrangements whereby market participants can qualify for, and participate in, auctions for the award of capacity.

The RAs have engaged Deloitte as Capacity Market Auditor to undertake a Market Audit of the operation and implementation of certain of the arrangements, procedures and processes as required under the Code. Section B.11 of the Code sets out the requirements of the Capacity Market Auditor. Paragraph B.11.1.1 of the Code requires the RAs to appoint a Market Auditor. As required under the Code, the RAs consulted on the scope of the Capacity Market Audit resulting in the publication of the Terms of Reference for the Capacity Market Audit (SEM-24-045) on 19 June 2024 ("ToR") in accordance with paragraph B.11.2 of the Code. The period of the Audit has been defined as covering the period from 1 May 2022 to 30 April 2023 and will incorporate the following auctions:

- T-4 2026/2027 – which took place on 23 March 2023

As defined in the ToR, the scope of the Capacity Market Audit focused on the activities of the SO under the Code and associated Agreed Procedures and covered the systems and processes within the control of the SO. The scope of the Capacity Market Auditor's assurance activities relates to the SO activities under the Code, to the extent covered by specific requirements in the Code, Appendices and Agreed Procedures, and included:

- Accession and Registration;
- Default, Suspension and Termination;
- Qualification;
- Operation of the auction and award of capacity;
- Secondary Trading;
- Implementation agreements;
- SO and other Charges;
- Invoicing and Payment;
- Credit Cover management;
- Disputes;
- Modifications; and
- Design Authority / Code development and Systems Upgrade.

1. Introduction (Continued)

Based on discussions with the RAs, the RAs have confirmed that those areas already assessed and reported on by the Capacity Auction Monitor are not required to also be assessed by the Capacity Market Auditor – in broad terms this excludes from the Auditor scope the activities relating to Qualification and Operation of the Auction included in the 12 month audit period from 1 May 2022 to 30 April 2023. During the planning and delivery of the work, we liaised with the Auction Monitor to discuss the scope and findings of their work.

Unless otherwise specified, words and expressions used in this Report have the same meaning as defined in the Code.

1.2 Requirement for Market Audit

The requirement for a Market Audit of the Code is set out in Section B of the Code in paragraphs B.11.1.1 to B11.2.8. As specified in the ToR, it covers the 12 month period ended 30 April 2023.

1.3 Report Structure

Section 2 contains our Market Audit Conclusion. The Market Audit Scope was agreed by the RAs in accordance with the ToR.

Section 3 contains our Report of Significant Issues, setting out matters identified during the course of the audit which, while not material in the context of the audit and not resulting in a qualified Audit Opinion, may have a significant impact on Parties to the Code. Where, in our judgement, matters arising may be significant to individual parties such matters have been included in the Report of Significant Issues with sufficient detail so as to allow the RAs and Parties to the Code to evaluate the impact of the cause and circumstances of matters reported. As set out in the ToR the Auditor will report on a volumetric basis with a materiality set at 20MW for the market level and 2MW at the participant level. In addition the ToR requires that the Auditor will also report on any "Significant Issues" regardless of materiality in order to capture any regular incidents including those which may have a potential significant quantitative or qualitative impact.

Section 4 contains details of Other Matters Arising which we wish to bring to the attention of the market. We include this section as we believe it may assist the RAs and Parties to the Code to judge for themselves the relative significance of all points reported.

Section 5 contains details of Follow up on prior year issues which we wish to bring to the attention of the market. We include this section to provide the RAs and Parties to the Code with the update around the resolution status of the Significant Issues and/or Other Matters Arising that had been documented in our report for the prior Capacity Market Audit for the 12 months ended 30 April 2022.

2. Market Auditor Conclusion

Independent Market Auditor's Assurance Report to the Commission for Regulation of Utilities ("The Commission" or "CRU") and the Utility Regulator ("UR") (together "The RAs")

We have performed reasonable assurance work over the extent to which the System Operator ("SO") has complied with the Code and relevant Agreed Procedures as defined in the "Terms of Reference for the Year 5 Market Audit" published by the RAs on 19 June 2024, for the 12 month period ending 30 April 2023. The engagement has been performed in accordance with ISAE 3000 (Revised) "Assurance Services Engagements other than Audits or Reviews of Historical Financial Information" ("ISAE 3000") issued by the International Auditing and Assurance Standards Board. In the context of this engagement, the terms "Audit" and "Market Audit" mean a reasonable assurance engagement performed in accordance with ISAE 3000.

This report is made solely for the RAs, as a body, in accordance with paragraph B.11.2.1 of the Code. Our work has been undertaken so that we might state to the RAs those matters we are required to state to them in a reasonable assurance report in accordance with ISAE 3000 and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the RAs and the Parties as a body, for our work, for this report, or for the conclusions we have formed. Parties to the Code may only rely on this report if they have agreed in writing to be bound by the conditions under which it has been prepared, in line with the engagement letter.

Unless otherwise specified, words and expressions used in this report have the same meaning as defined in the Code.

Responsibilities of the System Operator, RAs and Parties to the Code (together the "Responsible Party")

The Code is a legal agreement which, inter alia, sets out the terms of the Capacity Market arrangements to secure generation adequacy and capacity to meet the demands of consumers on the island of Ireland ("Single Electricity Market"). The Code defines the rules (the "Rules") and Agreed Procedures which are required to be followed by the signatories to the Code ("Parties") who are bound by its provisions.

The functions of the RAs are set out in the Electricity Regulation Act 1999, the Northern Ireland (Miscellaneous Provisions) Act 2006 and in the Code. In the context of the Market Audit, the role of the RAs as the Responsible Party is to appoint the Market Auditor and agree the terms of the Market Auditor's appointment, consult on and issue the Terms of Reference for the Market Audit, and receive Market Audit Reports.

The SO is responsible for the operation of the Single Electricity Market under the Code as set out in paragraphs A.1.1.1 and A.1.2.1 therein and for complying with the requirements of the Code and Agreed Procedures as listed in appendix A to the Code, insofar as they are applicable to the SO.

The responsibilities of the Parties in respect of the Market Audit are set out in paragraph B.5 of the Code, which requires parties to provide without charge to the Market Auditor in a timely manner, subject to any obligations of confidentiality, such information as is reasonably required by the Market Auditor to enable the Market Auditor to comply with the functions and obligations and Terms of Reference for the purposes of conducting the audit and preparing and finalising the Audit Report. A person may only become a Party to the Code in accordance with the terms of the Code and the Capacity Market Framework Agreement.

2. Market Auditor Conclusion (Continued)

Responsibilities of the Market Auditor

The requirements for the Market Audit are set out in paragraphs B.11.2.1 to B.11.2.8 of the Code, in particular paragraph B.11.2.1 of the Code which sets out that “The Capacity Market Auditor shall conduct an audit of the operation and implementation of the arrangements, procedures and processes under this Code at least once a year, in accordance with the Terms of Reference determined by the RAs.”. It is our responsibility as Market Auditor to execute the Market Audit as required under the Code and as set out in the Terms of Reference for the Year 5 Market Audit and provide a reasonable assurance report thereon. In conducting our engagement, we have complied with the Code of Ethics issued by the International Ethics Standards Board for Accountants, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

We apply International Standard on Quality Management 1 and accordingly maintain a comprehensive system of quality management including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We further include other matters not considered material / significant, based on the stipulated levels, that are considered of interest to parties to the Code in the “Other Matters Arising” section of the report.

Limitations and exclusions from scope

Our assurance work under this engagement excluded the audit of the obligations on the System Operators in relation to the Operation of the Auction and award of Capacity that was tested by the Capacity Auction Monitor. We liaised with the Capacity Auction Monitor during the performance of our assurance work in respect of the scope and findings of the Auction Monitor and sought to avoid duplicating the work performed by the Capacity Auction Monitor. The role and reporting obligations of the Capacity Auction Monitor are reflected in Section B.10.2 to B.10.4 of the Capacity Market Code.

There are inherent limitations in assurance engagements on controls as because of their nature they may not detect all errors or omissions in processing or reporting of transactions. The conclusions expressed herein only relate to the period under review, and as at the period end date specified and do not provide assurance in relation to any future period or date as changes to systems or controls subsequent to the period/year covered by this report may alter the validity of our opinions.

2. Market Auditor Conclusion (Continued)

Basis of assurance conclusion

We conducted our assurance work in accordance with ISAE 3000. That standard requires that we plan and perform our work to obtain appropriate evidence about the subject matter of the engagement sufficient to support a conclusion providing reasonable assurance when evaluated against the applicable criteria. In the context of the Market Audit, the subject matter consists of relevant activities of the SO which are evaluated against the applicable paragraphs of the Code and applicable Agreed Procedures as set out in the Terms of Reference for the Year 5 Market Audit (the 'Applicable Criteria').

Our assurance work included examination, on a sample basis, of evidence relevant to the Code and Agreed Procedures including the review of risks, control objectives and controls associated with the SO performance of their duties and operation of the Capacity Market arrangements. Our testing of the controls comprised review of documentation, corroborative enquiry with key SO staff and, on a sample basis, testing the operation of controls and the validity and accuracy of the calculations underlying settlement output.

We planned and performed our assurance work so as to obtain all the information and explanations which we considered necessary in order to provide us with sufficient evidence to give reasonable assurance that the SO has complied with the Code and relevant Agreed Procedures as defined in the Terms of Reference for the Year 5 Market Audit.

We were not required to carry out an audit conducted in accordance with International Standards on Auditing (Ireland). Consequently, our conclusion is not expressed as an audit opinion.

For the purpose of our conclusion a qualification, in terms of material non-compliance with the Rules and relevant Agreed Procedures of the Code, would arise if the volumetric impact of errors identified individually or in aggregate exceeded the volumetric materiality value as set out in section 1.3 above or where we considered the breach to be of such significance that it undermined the robust operation of the processes in place.

We have prepared a Report of Significant Issues as included in Section 3 setting out matters identified during the course of the audit which, while not material in the context of the audit, may have a significant impact for Parties to the Code. Our conclusion should be read in conjunction with the "Report of Significant Issues" but is not qualified in respect of the matters contained in the Report of Significant Issues.

2. Market Auditor Conclusion (Continued)

Conclusion

On the basis set out above and subject to the exclusions noted in the Responsibilities of the Market Auditor section above, during the period 1 May 2022 to 30 April 2023 the SO has, in all material respects, complied with the Code and relevant Agreed Procedures as set out in the "Terms of Reference for the Year 5 Market Audit" published by the RAs on 19 June 2024.

A handwritten signature in black ink, appearing to be 'J. Smith'.

For and on behalf of
Deloitte Ireland LLP
Chartered Accountants
Deloitte & Touche House
29 Earlsfort Terrace
Dublin 2
Date: 26 February 2025

3. Report of Significant Issues

Issue	Effect	SO Response
No issues noted		

4. Other Matters Arising

Issue	Effect	SO Response
Accession and Registration		
1. Completion of Registration and Deregistration Processes as per Code Timescales		
<p>We noted the following instances from our testing where the specific timing requirements of the Code were not met:</p> <ul style="list-style-type: none"> a) For 1 of the 3 parties sampled, the System Operators did not complete the assessment of the application form within the required timeframe. The assessment of the application form was completed 6 working days after the required timeframe; b) For 1 of the 3 parties sampled, the System Operators did not send the Accession Deed within the required timeframe to the applicant. The Accession Deed was sent by the System Operators 6 working days after the required timeframe; c) For 3 of the 3 parties sampled, the System Operators did not send the signed and dated Accession Deed within the required timeframe to the applicant. The signed and dated Accession Deed was sent by the System Operators between 3 and 5 months after the required timeframe for the items sampled; d) For 1 of the 5 units sampled, the System Operators did not submit the notice to the Applicant to notify as to whether or not the provisional registration has been approved within the required timeframe. The notice was submitted more than 1 month after the required timeframe; and e) For 1 of the 2 units sampled, the System Operators issued the deregistration consent order to the Participant, Market Operator and Regulatory Authorities on the date of Deregistration. 	<ul style="list-style-type: none"> a) Non-compliance with Section B.5.1.3 of the Code and Agreed Procedure 1, 3.1, Step 3; b) Non-compliance with Section B.5.1.7 of the Code and Agreed Procedure 1, 3.1, Step 7 c) Non-compliance with Section B.5.1.7 of the Code and Agreed Procedure 1, 3.1, Step 9; d) Non-Compliance with Section B.5.2.10 of the Code and Agreed Procedure 1, 3.2, Step 8; and e) Non-compliance with Section B.5.6.3 of the Code and Agreed Procedure 1, 3.3, Step 9. 	<ul style="list-style-type: none"> a) The registration pack was received by the Capacity Market team, but was not received by Capacity Market Registration Team. It was issued to the wrong email address originally, Capacity Market Team resend registration pack to Capacity Market Registration Team. Capacity Market Registration Team issued IDs and Accession Deed in 3 working days. A review of the associated process will be conducted. b) The registration pack was received by the Capacity Market team, but was not received by Capacity Market Registration Team. It was issued to the wrong email address originally, Capacity Market Team resend registration pack to Capacity Market Registration Team. Capacity Market Registration Team issued IDs and Accession Deed in 3 working days. A review of the associated process will be conducted. c) The SO was unable to get the Accession Deed executed within the timelines outlined in the AP. The SO

Issue	Effect	SO Response
		<p>submitted a Modification to extend this timeline.</p> <p>d) A follow up email was sent requesting further information although it is still out of the required timeline. No evidence can be found of the email confirming assessment was complete within the timeline, the email provided was the only evidence located.</p> <p>e) Consent Order gets drafted by Capacity Market Team then sent along to the Capacity Market Registrations team for issue to participant. Despite timely notice being given to Capacity Team for this to be drafted, it was not received by the Capacity Market Registrations team on time and hence was only issued to participant on deregistration date. Observation noted.</p>
<p>2. Process activity documentation not located</p>		
<p>We noted the following instances from our testing where the SO was unable to locate specific process activity documentation to evidence that the required process steps / activity had been followed as required by the Code:</p> <p>a) For 3 of the 3 parties sampled, the SO could not provide evidence to show that they published notification that the Applicant has become a Party within 2 working days of the Applicant becoming a Party. Evidence was provided to show the published list but none to prove it was done within 2 working days.</p>	<p>a) Non-compliance with Section B.5.1.7 of the Code and Agreed Procedure 1, 3.1, Step 10</p>	<p>The process has been updated to include an email issued to the team each time The List of Registered Parties was updated.</p>

Issue	Effect	SO Response
Operation of the auction and award of capacity		
3. Process activity documentation not located – Termination notice notification		
<p>We noted the following instance from our testing where the SO was unable to provide or locate specific process activity documentation to evidence that the required process steps / activity had been followed as required by the Code:</p> <p>a) For 2 of the 3 samples selected, the SO could not locate the email submitted to the Regulatory Authorities including the Termination notice.</p>	a) Non-compliance with Section J.6.1.8(a) of the Code	Unfortunately the SOs are unable to locate the email that contains the evidence.
4. Capacity Auction Monitor's redacted report not published within the required timeframe		
The System Operator did not publish the Capacity Auction Monitor's redacted report for the Capacity Auction 2026/2027 T-4 within the required timeframe. The redacted report was published more than 1 month after the required timeframe.	Non-compliance with Section B.10.4.2 of the Code	Due to running parallel auctions the SO missed the deadline of publishing the Capacity Auction Monitor's redacted report. The SOs will review its auction process to ensure that there is an 'owner' for monitor reports to ensure that these items don't get missed.
Disputes		
5. Panel appointments not confirmed by the SO for the year under review		
The SO did not confirm the continued willingness and availability of each Panel members to be included in the Panel for the year under review.	Non-compliance with Section B.14.4.3 of the Code	We are currently following up with panel members now to confirm their availability. SOs will produce a document detailing the process which will include this step so that remain compliant in future.

Issue	Effect	SO Response
6. Notices received from the Panel Chairperson in relation to the appointment of the CMDRB members not published		
For 2 of the 2 disputes sampled, the SO did not publish the notices received from the Panel Chairperson in relation to the appointment of the Capacity Market Dispute Resolution Board ("CMDRB") members to hear and determine Qualification Disputes arising out of the Qualification Process, prior to the Provisional Qualifications Result Date, in respect of a Capacity Auction.	Non-compliance with Section B.14.5.3 of the Code	The SO's will draft a document that encompasses the prescribed steps outlined in B. 14 5.
Secondary Trading		
7. Trade status not updated in the Capacity and Trade Register		
For 1 of the 2 samples selected the SO did not update the status of the trade to "Inactive" in the Capacity and Trade Register when the trade was cancelled.	Non-compliance with Section M.7.2.3 of the Code.	The SOs review the current associated process documentation and update secondary trading work instruction accordingly.
8. Timings of Alternative Secondary Trading process activity		
<p>We noted the following instances from our testing where the specific timing requirements of the Code were not met:</p> <ul style="list-style-type: none"> a) The SO did not submit the weekly values for the Product Load Following Factor (PLFF) within the required timeframe. The PLFF values were submitted more than seven months after the required timeframe. b) The SO did not publish the weekly values for the Product Load Following Factor (PLFF) within the required timeframe. The PLFF values were published more than fifteen working days after the required timeframe. c) For 2 of the 10 samples tested, the SO did not approve the Alternative Secondary Trade within the required timeframe. The trade was approved 6 working days after the required timeframe. . 	<ul style="list-style-type: none"> a) Non-Compliance with Section M.12.4.2 of the Code; b) Non-Compliance with Section M.12.4.6 of the Code; and c) Non-Compliance with Section M.12.3.1 of the Code. 	<ul style="list-style-type: none"> a) The SOs will analyse the evidence of non-compliance in this area, and where possible, consider whether the current CMC drafting may benefit from a modification in order to improve the understanding of this area. b) The SOs will analyse the evidence of non-compliance in this area, and where possible, consider whether the current CMC drafting may benefit from a modification in order to improve the understanding of this area.

Issue	Effect	SO Response
		c) The SOs are seeking to implement an online secondary trading platform whereby Participants can submit trades and are instantly validated. SO have begun discussing this design approach with our vendor. SO continuously work to improve this manual process to make sure SO process secondary trading on time and without any errors.
9. Process activity documentation not located – Notification of Awarded Capacity		
For 1 of the 10 samples tested, SO could not provide or locate specific process activity documentation to evidence that notification of the Awarded Capacity and associated price was submitted to the Participants who submitted an Alternative Secondary Trade Notification.	Non-Compliance with Section M.12.9.1 of the Code	The SO's have completed a review and implemented improvements.
Agreed Procedure 4 ('AP4')- Communication Channel Qualification		
10. Communication Channel Qualification Testing		
In order to perform Communication Channel Testing each Party should be provided access to a Party Certification Environment to perform testing as set out in AP4. No such Party Certification Environment exists and hence the Communication Channel Qualification Testing ("CCQT") is not performed.	Non-compliance with AP4 - Section 2.2 and 2.3	The SOs will analyse the evidence of non-compliance in this area, and where possible, consider whether the current CMC drafting may benefit from a modification in order to improve the understanding of this area.

Issue	Effect	SO Response
11. User access termination		
For the sample of 1 of the 3 sampled internal users with access revoked during the period the supporting request/tickets could not be evidenced and hence we were unable to verify the documented process was followed.	Non-compliance with AP4 - System Operators User Access Management 2.10.5	Quarterly CMP audits in place to verify all internal (Eirgrid, CAM, Unicorn and IT) and external accounts.
12. User access Review		
While we inspected that user access review was initiated for Q3 and Q4 FY2022, we were not able to evidence that the access was certified/approved for the users in the listing. We were not able to evidence the final signoff from the reviewers or managers.	Non-compliance with AP4 - System Operators User Access Management 2.10.5.	Quarterly CMP audits in place to verify all internal (Eirgrid, CAM, Unicorn and IT) and external accounts.

Issue	Effect	SO Response
Agreed Procedure 5 ('AP5') - System Operation, Testing, Upgrading and Support		
13.Helpdesk/Logging and Monitoring of Helpdesk Requests		
<p>The timeliness of requests closure is not monitored or recorded. No tracking mechanism is in place to track whether each category request was closed as per AP5 - 2.1 to 2.1.2. The helpdesk requests are not categorised and helpdesk requests are not logged by the SO with the resolution recorded.</p>	<p>Non-compliance with AP5 - Section 2.1, 2.1.2 and 2.1.3</p>	<p>It is the intention of the SOs to review the CMC and identify instances whereby aspects of the code that were written prior to the operation of any capacity auction, are really needed in practice. The SOs intend to undertake a review this year.</p>
14.Release Management (Scheduled Releases) and Proposed implementation plan		
<p>We were not able to obtain evidence documentation of release plan. The evidence of release timetable and release plan as per the agreed procedures was not available for review.</p> <p>The process around AP5, section 2.2.2, "proposed implementation plan" was not followed.</p> <p>The System Operators do not issue a revised impact assessment to the Participants and the Market Operator (including the final Implementation classification, Release content and proposed timeline).</p>	<p>Non-compliance with AP5 - Section 2.2.2</p>	<p>Bi-annual release is not followed if the changes are critical for the business and impact the auction. However, we are looking into this and may get this removed since most of our release are out of Bi-annual release.</p>
15.Change Testing		
<p>There is no separate test environment to allow affected parties to test the interface when release involves changes to the interface with parties as required in Agreed Procedure 5.</p>	<p>Non-compliance to AP5, Section 2.2.4 - Testing</p>	<p>It is the intention of the SOs to review the CMC and identify instances whereby aspects of the code that were written prior to the operation of any capacity auction, are really needed in practice. The SOs intend to undertake a review this year.</p>

5. Follow up on prior year issues

Title	Year 4 Classification	Year 5 Status (as per SO)	SO Update [where not resolved]
Credit Cover Management			
Deed of Charge not executed	Other Matter	Open	Deeds have been executed currently with the board will take approximately 2 months. There is no further tracking after the deeds go for final execution by the EirGrid board. SO is retraining team members and documenting the process for smooth execution in future.
Accession and Registration			
Completion of Registration and Deregistration Processes as per Code Timescales	Other Matter	Resolution in progress	Related modification was expected due in April 2024, however as part of the internal review it was requested that the proposed modification receive a thorough evaluation of proposed revisions and changes. To this end the modification is still in this process.
Process activity documentation not located	Other Matter	Partially resolved	<p>For Party Registration, the process has been updated for ensuring proper process activity documentation. For unit registration, there is no update regarding the possibility of any modification.</p> <p>With regards to the relevant deregistration processes, related modification was expected due in April 2024, however as part of the internal review it was requested that the proposed modification receive a thorough evaluation of proposed revisions and changes. To this end the modification is still in this process.</p>

Title	Year 4 Classification	Year 5 Status (as per SO)	SO Update [where not resolved]
Disputes			
Process activity documentation not provided - Panel appointments	Other Matter	Open	The SO's will draft a document that encompasses the prescribed steps outlined in B. 14 5.
Modification			
Timings of Modification process activity	Other Matter	Resolved	
Secondary Trading			
Process activity documentation not provided - Notification of Awarded Capacity	Other Matter	Resolved	
PLFF values not published within the required timeframe	Other Matter	Open	The SO to coordinate with the internal teams and needs to coordinate with RA on finalizing the modifications. The MODs is not drafted yet. The SOs will propose a modification.
Agreed Procedure 4 - Communication Channel Qualification Testing			
Communication Channel Qualification Testing	Other Matter	Open	A separate environment is not required. Consideration will be given to have a mod raised to remove this requirement. The MODs have not drafted yet but there is a plan to modify/remove these clauses. The SOs will propose a modification.
User access termination	Other Matter	Resolution in progress	We have the quarterly CMP audits in place to verify all internal (EirGrid, CAM, Unicorn and IT) and external accounts.

Title	Year 4 Classification	Year 5 Status (as per SO)	SO Update [where not resolved]
Agreed Procedure 5 - System Operation, Testing, Upgrading and Support			
Helpdesk/ Logging and Monitoring of Helpdesk Requests	Other Matter	Open	<p>There is no logging system (ticketing system) to track queries coming directly in the Capacity Market mailbox. The TSOs will try to submit a MOD by end of year to get this removed.</p> <p>We meet the obligation by assigning the requests to SMEs within our team. There are a number of paragraphs within the CMC that either need to be re-worded or removed. The SOs intend to undertake a review this year</p>
Release Management (Scheduled Releases) and Proposed implementation plan	Other Matter	Open	Bi-annual release is not followed if the changes are critical for the business and impact the auction. However, we looking onto this and may get this removed since most of our release are out of Bi-annual releases.
Change Testing	Other Matter	Open	<p>There may be a MOD remove this from the code. Our view is that as the platform is controlled by us and clients have very limited access to make any changes, on most of the screens the clients have read-only access. There are a number of paragraphs within the CMC that either need to be re-worded or removed. The SOs intend to undertake a review this year</p>



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