

EirGrid/SONI

VTOD Workaround – Participant Guide

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1 PROCESS CONTEXT

1.1 BACKGROUND

The *VTOD Workaround – Participant Guide* has been drafted as a result of a known issue (#5942) identified within the market systems.

Under the balancing market design, a Validation Technical Offer Data (VTOD) Set intended to be used with respect to a Trading Day (23:00 to 23:00) must be selected by Gate Closure 1 (13:30). The Technical Offer Data (TOD) contained within that set, shall be effective for the entire Trading Day. Should no VTOD Set be selected for a Trading Day, then the primary set (Set 1) shall be used for that Trading Day, as set out in clause D.5.4.2 of the Trading and Settlement Code (TSC).

This identified issue occurs where a Participant submits a change to a data element within a VTOD Set that they are intending to use as their operating set on the day that the change is approved (i.e. submission plus 11 Working Days). When both System Operator (SO) and Market Operator (MO) approval is granted, this VTOD amendment takes effect within the market systems with immediate effect; rather than the first Trading Day for which Gate Closure 1 has not yet occurred. This document sets out a process to ensure that VTOD for a Trading Day does not change post Gate Closure 1 (GC1; 13:30), with respect to that Trading Day. Please note this workaround will remain in place until issue #5942 has been resolved. This issue (#5942) has been added to the Known Issues Report published to the SEMO Website.

It should be noted that this issue does not apply where a Participant wishes to make an amendment to a VTOD Set they do not intend to use as their operating set on the calendar day that the VTOD change becomes effective. Under these circumstances the standard VTOD process will continue to apply ([Participant Guide to Submitting VTOD](#)).

2 VTOD WORKAROUND

2.1 OVERVIEW

As per the existing VTOD process, if a Participant wishes to amend an existing VTOD Set they must continue to do so via the Market Participant Interface (MPI). Participants should also continue to notify the Market Operator in advance of the submission via email address TradingOperations@sem-o.com. At this stage the Market Operator shall contact the Participant to discuss the submission and approval process, detailed below.

Under this workaround, if a Participant wishes to make amendments to a VTOD Set that they intend to use as their operating set on the calendar day that the VTOD change becomes effective, they must follow the below steps outlined in Table 1 and Table 2:

Table 1 – First Change Required

Number of Approved VTOD Sets	Seeking to Change Operational VTOD
Less than six VTOD Sets (i.e. 3 Sets)	Submit an additional VTOD Set (i.e. Set 4) with the intended changes they wish to make to their operational VTOD Set (i.e. Set 1/2/3).
Six VTOD Sets	Submit an amendment to an alternative VTOD Set (i.e. Set 6) with the intended changes they wish to make to their operational VTOD Set (i.e. Set 1/2/3/4/5).

This workaround follows the 11 Working Day¹ approval process as set out in the TSC. Once the VTOD submitted in accordance with Table 1 has been approved, the Participant must submit an additional VTOD change, as set out below in Table 2. This second required change will be treated as a new VTOD submission and is subject to the same 11 Working Day approval process.

Table 2 – Second Change Required

Number of Approved VTOD Sets	Seeking to Change Operational VTOD ²
Less than six VTOD Sets (i.e. 3 Sets)	<ol style="list-style-type: none"> 1. Select the SO/MO approved VTOD Set (i.e. Set 4) as their operational VTOD Set (this reflects the amendments they intended to make to their operational set). 2. Submit the same amendments to the intended VTOD Set (i.e. Set 1), for SO/MO approval.
Six VTOD Sets	<ol style="list-style-type: none"> 1. Select the SO/MO approved VTOD Set (i.e. Set 6) as their operational VTOD Set (this reflects the amendments they intended to make to their operational set). 2. Submit the same amendments to the intended VTOD Set (i.e. Set 1). <p>Note: Should the Participant wish to revert Set 6 back to the original approved</p>

¹10 Working Days for SO approval and 1 additional Working Day for Market Operator approval.

² Step 1 within this table is intended as a guide only, Participants should continue to reflect the VTOD Set they intend to operate on for any given Trading Day.

VTOD for this set, then this must be submitted after Set 1 has been approved (i.e. a three step process). The submission also follows the 11 Working Day approval process set out in the TSC.

3 PROCESS STEPS

This section details the process steps setting out the timings and responsibilities of each Party involved in the VTOD workaround process.

3.1.1 STEP DESCRIPTIONS & TIMINGS – SCENARIO 1

Participant wishes to amend their operational VTOD set and they do not have six approved VTOD Sets.

In the below example the Participant has three approved VTOD Sets.

Step	Step Description	Responsible Role	Indicative Timing
1	<p>The Participant must inform the Market Operator via email that they wish to make changes to their operational set.</p> <p>Subject to confirmation from the Market Operator, the Participant shall submit the intended changes they wish to make to their operational set (i.e. Set 1) as a new VTOD submission (i.e. Set 4):</p> <p>Participant Actions</p> <ul style="list-style-type: none"> Email TradingOperations@sem-o.com; and Enter additional VTOD Set via MPI. 	Participant	D
2	<p>The Market Operator will notify the System Operator of the VTOD submission.</p> <p>The System Operator will then have 10 Working Days to either approve or reject the VTOD submission and to notify the Market Operator.</p> <p>Note: <i>The Market Operator has one additional Working Day to match the approval status in the market systems and notify the Participant.</i></p> <p>System Operator & Market Operator Actions</p> <ul style="list-style-type: none"> Approved – Proceed to Step 4. Denied – Proceed to Step 3. 	System Operator, Market Operator	D+11 Working Days
3	<p>Participant to submit revised VTOD changes as per advice from the System Operator.</p> <p>Participant Actions</p> <ul style="list-style-type: none"> Submit requested changes to VTOD via MPI; and Email TradingOperations@sem-o.com. 	Participant	D
4	<p>(a) Participant may select the SO and MO approved VTOD Set as their Operational VTOD Set before GC1 (i.e. Set 4); and</p> <p>(b) Participant shall submit the same amendments to the original intended VTOD Set (i.e. Set 1).</p> <p>Participant Actions</p> <ul style="list-style-type: none"> The Participant can select the approved VTOD Set before GC1; Enter amendments to original intended VTOD Set via MPI; and 	Participant	(a)D+11 (b)D

	<ul style="list-style-type: none"> Email tradingoperations@sem-o.com. 		
5	<p>The Market Operator will notify the System Operator of the VTOD submission.</p> <p>The System Operator will then have 10 Working Days to either approve or reject the second VTOD submission and to notify the Market Operator.</p> <p>Note: <i>The Market Operator has one additional Working Day to match the approval status in the market systems and notify the Participant.</i></p> <p>System Operator & Market Operator Actions</p> <ul style="list-style-type: none"> Approved – Proceed to Step 7. Denied – Proceed to Step 6. 	System Operator, Market Operator	D+11 Working Days
6	<p>Participant to submit revised VTOD changes as per advice from the System Operator.</p> <p>Participant Actions</p> <ul style="list-style-type: none"> Submit requested changes to VTOD via MPI; and Email TradingOperations@sem-o.com. 	Participant	D
7	<p>The Participant can select the approved VTOD as their operational set, where Gate Closure 1 has not occurred. (End Process)</p>	Participant	D+11 Working Days

3.1.2 STEP DESCRIPTIONS & TIMINGS – SCENARIO 2

Participant wishes to amend their operational VTOD and they have six approved VTOD Sets.

In the below example the Participant will use Set 6 to facilitate this workaround.

Step	Description	Responsible Role	Indicative Timing
1	<p>The Participant must inform the Market Operator via email that they wish to make changes to their operational set.</p> <p>Subject to confirmation from the Market Operator the Participant shall submit the intended changes they wish to make to their Operational Set (i.e. Set 1) as a VTOD amendment to an alternative VTOD Set (i.e. Set 6):</p> <p>Participant Actions</p> <ul style="list-style-type: none"> Email TradingOperations@sem-o.com; and Enter VTOD amendment to Set 6 via MPI. 	Participant	D
2	<p>The Market Operator will notify the System Operator of the VTOD submission.</p> <p>The System Operator will then have 10 Working Days to either approve or reject the VTOD submission and to notify the Market Operator.</p> <p>Note: <i>The Market Operator has one additional Working Day to match the approval status in the market systems and notify the Participant.</i></p>	System Operator, Market Operator	D+11 Working Days

System Operator & Market Operator Actions			
	<ul style="list-style-type: none"> • Approved – Proceed to Step 4. • Denied – Proceed to Step 3. 		
3	<p>Participant to submit revised VTOD changes as per advice from the System Operator:</p> <p>Participant Actions</p> <ul style="list-style-type: none"> • Submit requested changes to VTOD via MPI; and • Email TradingOperations@sem-o.com. 	Participant	D
4	<p>(a) Participant may select the SO and MO approved VTOD Set as their Operational VTOD Set before GC1 (i.e. Set 6); and</p> <p>(b) Participant shall submit the same amendments to the original intended VTOD Set (i.e. Set 1).</p> <p>Participant Actions</p> <ul style="list-style-type: none"> • The Participant can select the approved VTOD Set before GC1; • Enter amendments to original intended VTOD Set via MPI; and • Email tradingoperations@sem-o.com. 	Participant	(a)D+11 (b)D
5	<p>The Market Operator will notify the System Operator of the VTOD submission.</p> <p>The System Operator will then have 10 Working Days to either approve or reject the VTOD submission and to notify the Market Operator.</p> <p>Note: <i>The Market Operator has one additional Working Day to match the approval status in the market systems and notify the Participant.</i></p> <p>System Operator & Market Operator Actions</p> <ul style="list-style-type: none"> • Approved – Proceed to Step 7. • Denied – Proceed to Step 6. 	System Operator, Market Operator	D+11 Working days
6	<p>Participant to submit revised VTOD changes as per advice from the System Operator:</p> <p>Participant Actions</p> <ul style="list-style-type: none"> • Submit requested changes to VTOD via MPI; and • Email TradingOperations@sem-o.com. 	Participant	D
7	<p>(a) Participant can select the SO and MO approved VTOD as their Operational Set.</p> <p>(b) In order to complete the process the Participant can submit a final VTOD amendment to the initial amended VTOD Set (i.e. Set 6), to reflect the initial VTOD parameters.</p> <p>Participant Actions</p> <ul style="list-style-type: none"> • The Participant can select the approved VTOD Set before GC1; • Enter amendments to reset VTOD Set 6 parameters via MPI; and • Email tradingoperations@sem-o.com. 	Participant	(a)D+11 (b)D
8	The Market Operator will notify the System Operator of the VTOD	System Operator,	D+11

	<p>submission.</p> <p>The System Operator will then have 10 Working Days to either approve or reject the VTOD submission and to notify the Market Operator.</p> <p>Note: <i>The Market Operator has one additional Working Day to match the approval status in the market systems and notify the Participant.</i></p> <p>System Operator & Market Operator Actions</p> <ul style="list-style-type: none"> • Approved – Proceed to Step 10. • Denied – Proceed to Step 9. 	Market Operator	Working Days
9	<p>Participant to submit revised VTOD changes as per advice from the System Operator:</p> <p>Participant Actions</p> <ul style="list-style-type: none"> • Submit requested changes to VTOD via MPI; and • Email TradingOperations@sem-o.com. 	Participant	D
10	<p>The Participant can select the SO and MO approved VTOD as their operational set for future Trading Days, where the TOD gate window is open. (End Process).</p>	Participant	D+11 Working Days

3.1.2 STEP DESCRIPTIONS & TIMINGS – SCENARIO 3

Participant wishes to amend a VTOD set which they are not currently selecting as an operational set. This is the normal VTOD process, there is no workaround required.

Step	Step Description	Responsible Role	Indicative Timing
1	<p>The Participant must inform the Market Operator via email that they wish to make amendments to a non-operational VTOD Set.</p> <p>Subject to confirmation from the Market Operator Participant may submit changes to the applicable non-operational VTOD Set and/or add an additional VTOD Set.</p> <p>Participant Actions</p> <ul style="list-style-type: none"> • Email TradingOperations@sem-o.com; and • Enter additional VTOD Set via MPI. 	Participant	D
2	<p>The Market Operator will notify the System Operator of the VTOD submission.</p> <p>The System Operator will then have 10 Working Days to either approve or reject the VTOD submission and to notify the Market Operator.</p> <p>Note: <i>The Market Operator has one additional Working Day to match the approval status in the market systems and notify the Participant.</i></p> <p>System Operator & Market Operator Actions</p> <ul style="list-style-type: none"> • Approved – Proceed to Step 4. • Denied – Proceed to Step 3. 	System Operator, Market Operator	D+11 Working Days

3	Participant to submit requested changes to the VTOD as per advice from the System Operator:	Participant	D
Participant Actions			
<ul style="list-style-type: none"> • Submit requested changes to VTOD via MPI; and • Email TradingOperations@sem-o.com. 			
4	The submitted VTOD becomes active in Market Systems for the Participant to select as their operational set for future Trading Days.	Participant	D+11 Working Days

4 PROCESS DIAGRAMS

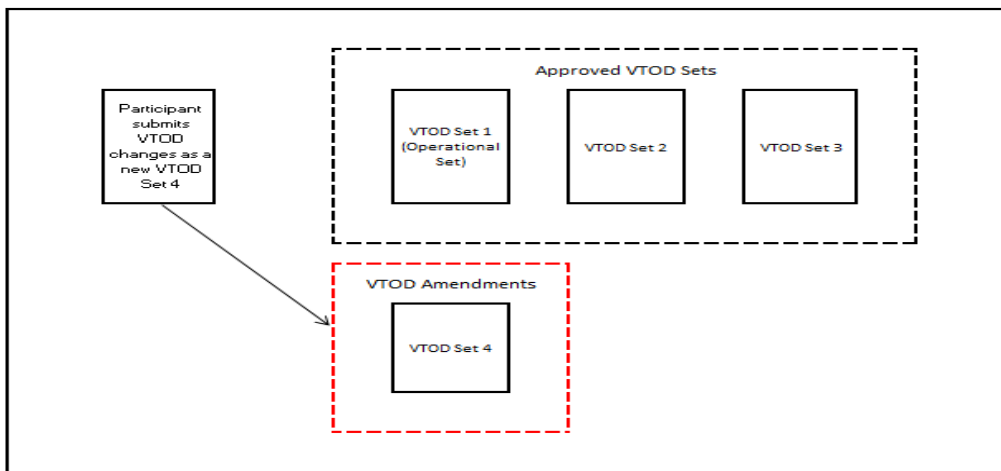
The below visual diagrams provide a basic step-by-step guide of how the VTOD Workaround Procedure will work.

4.1 PARTICIPANT DOES NOT HAVE SIX VTOD SETS

In the below example the Participant has three approved VTOD sets.

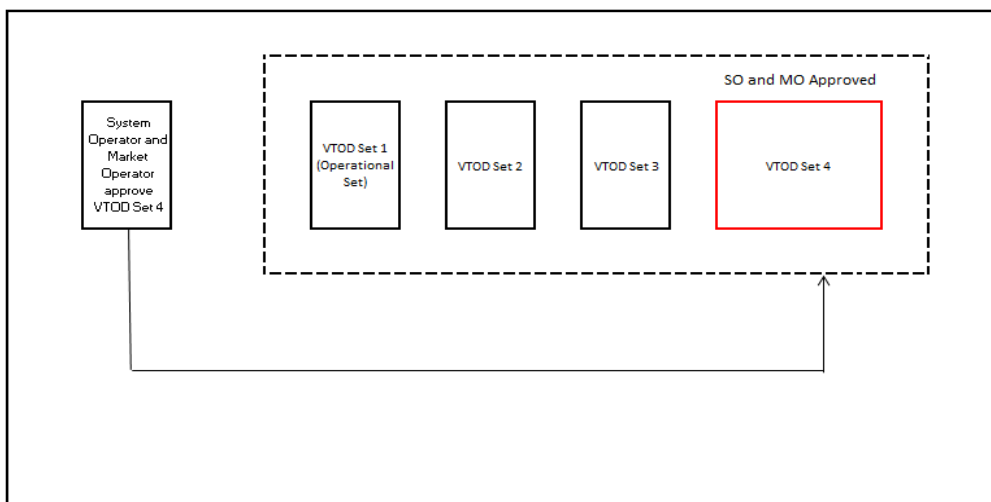
Step 1: The Participant submits the intended changes to VTOD Set 1 as a new VTOD Submission (i.e. Set 4).

Indicative Timing: D



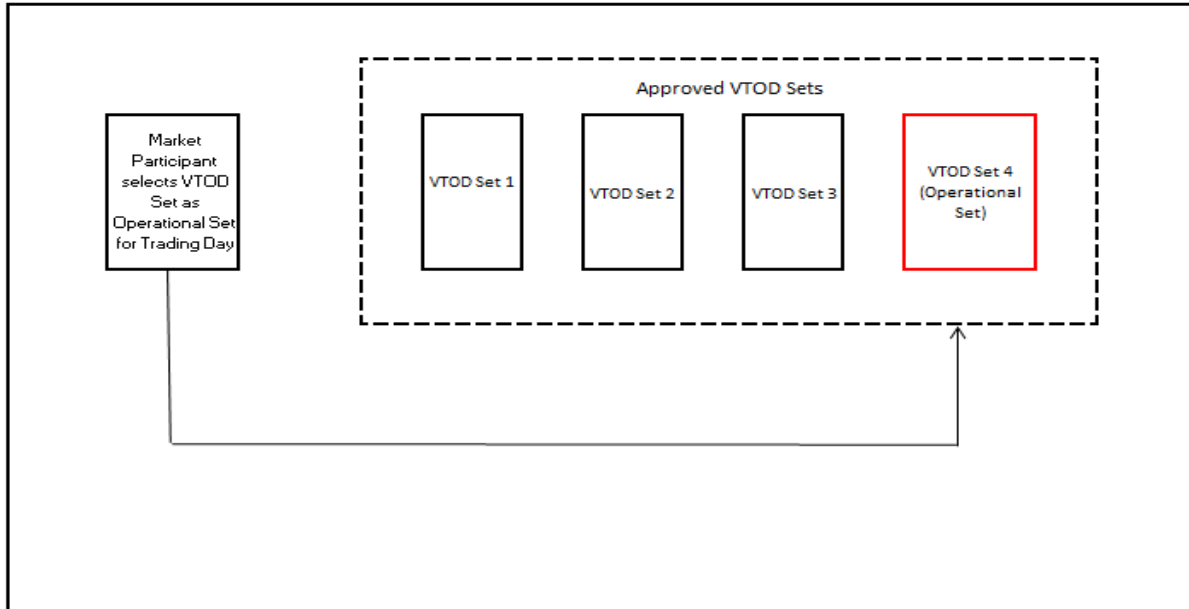
Step 2: The VTOD is approved by both the System Operator and Market Operator within the 11 Working Day timeframe.

Indicative Timing: D+11 Working Days



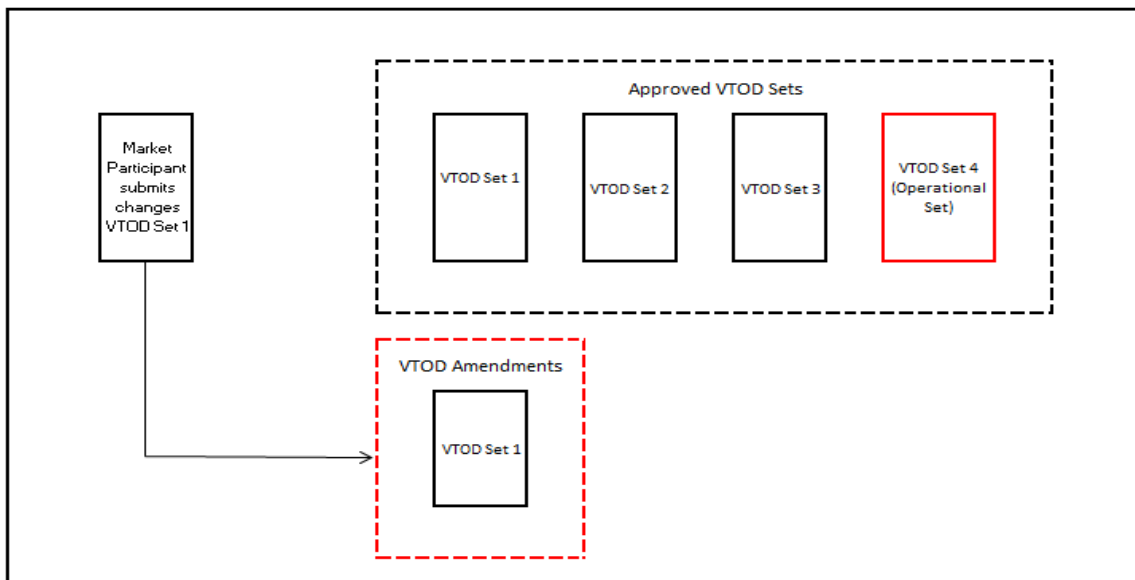
Step 3a: The Participant may select the SO and MO approved VTOD Set 4 as their operational set for the Trading Day prior to GC1.

Indicative Timing: D+11 Working Days (Selecting approved VTOD Set 4)



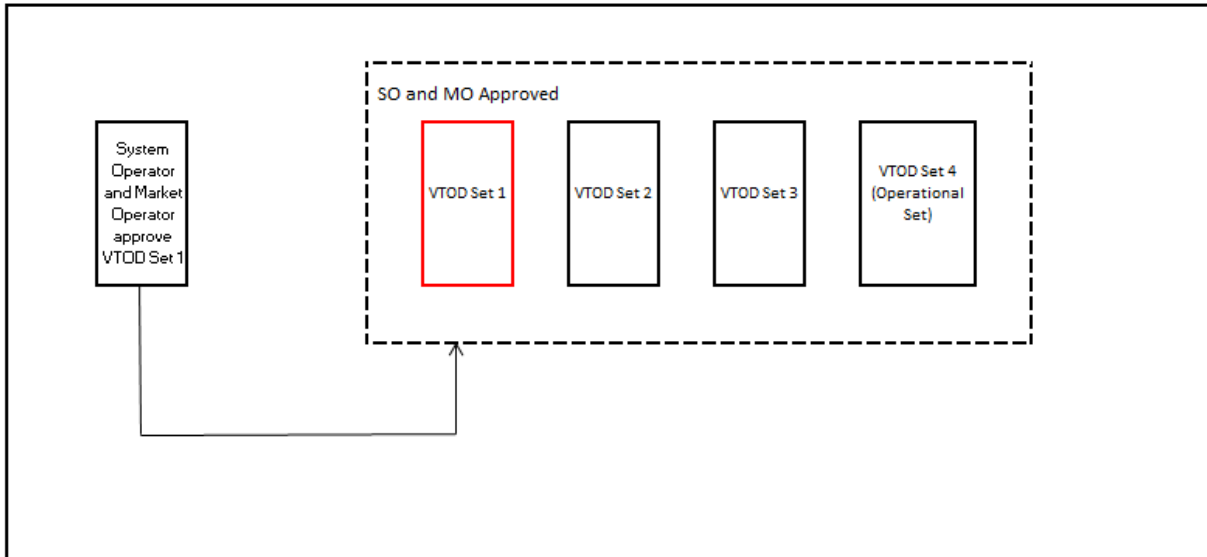
Step 3b: The Participant submits the same change to VTOD Set 1 (intended operational set)

Indicative Timing: D (The VTOD amendment to Set 1 is regarded as the first day of a new VTOD submission)



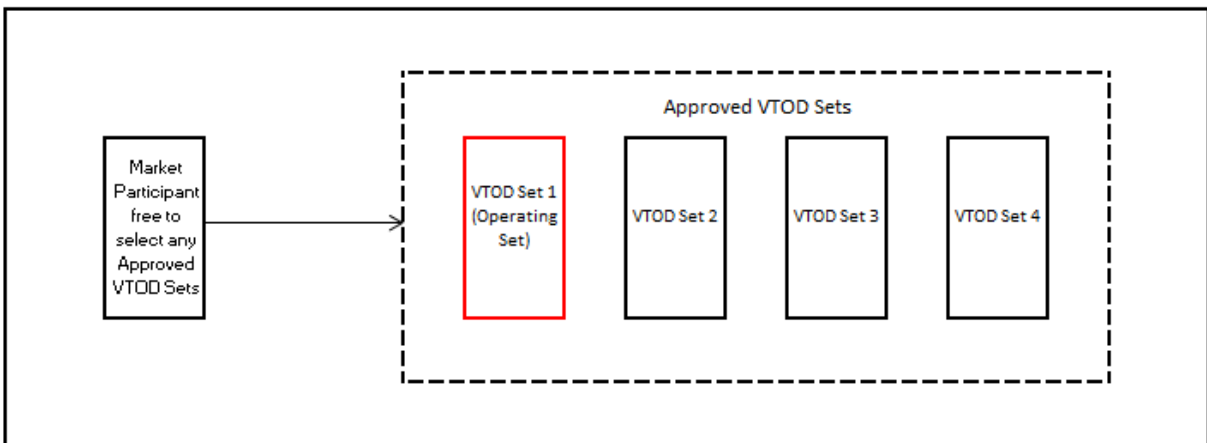
Step 4: The VTOD is approved by both the System Operator and Market Operator within the 11 Working Day timeframe.

Indicative Timing: D+11 Working Days



Step 5: The process is complete and the Participant can select from any one of the four approved VTOD Sets.

Indicative Timing: D+11 Working Days

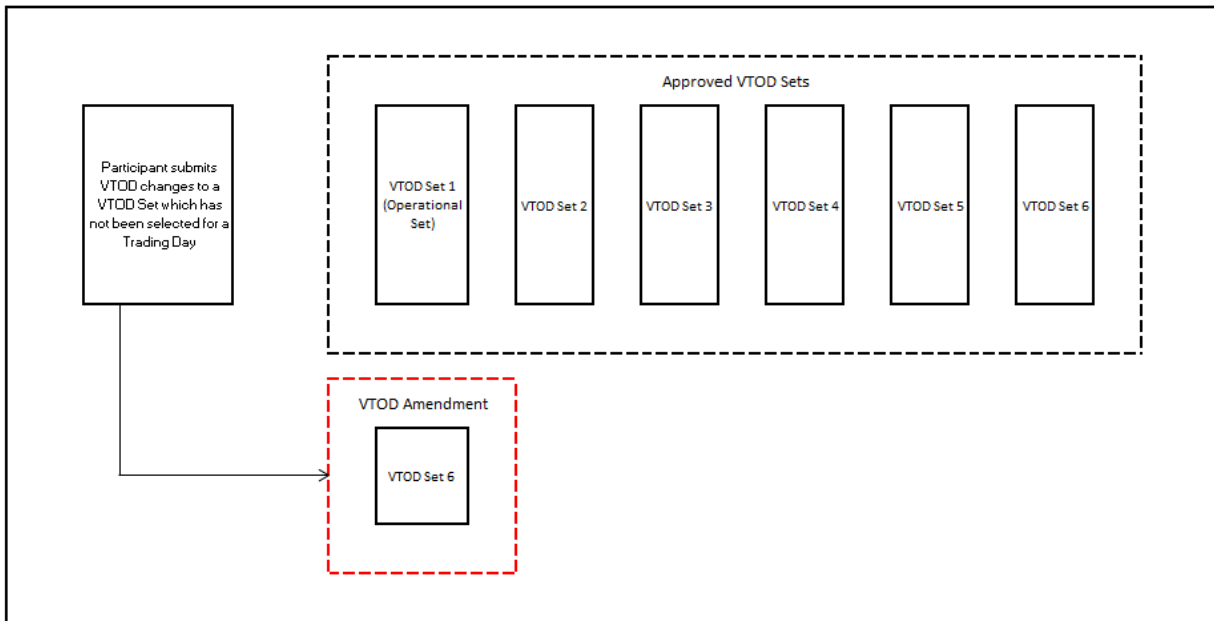


4.2 PARTICIPANT DOES HAVE SIX VTOD SETS

In the below example the Participant has six approved VTOD sets.

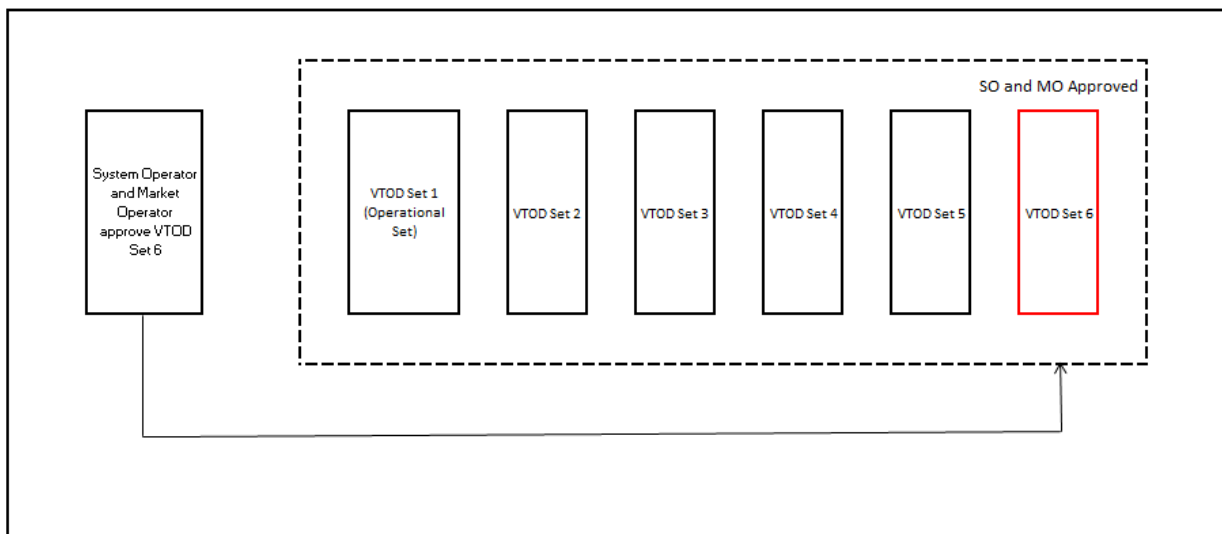
Step 1: The Participant submits intended changes to Set 1 to a non-operational VTOD Set (i.e. Set 6).

Indicative Timing: D



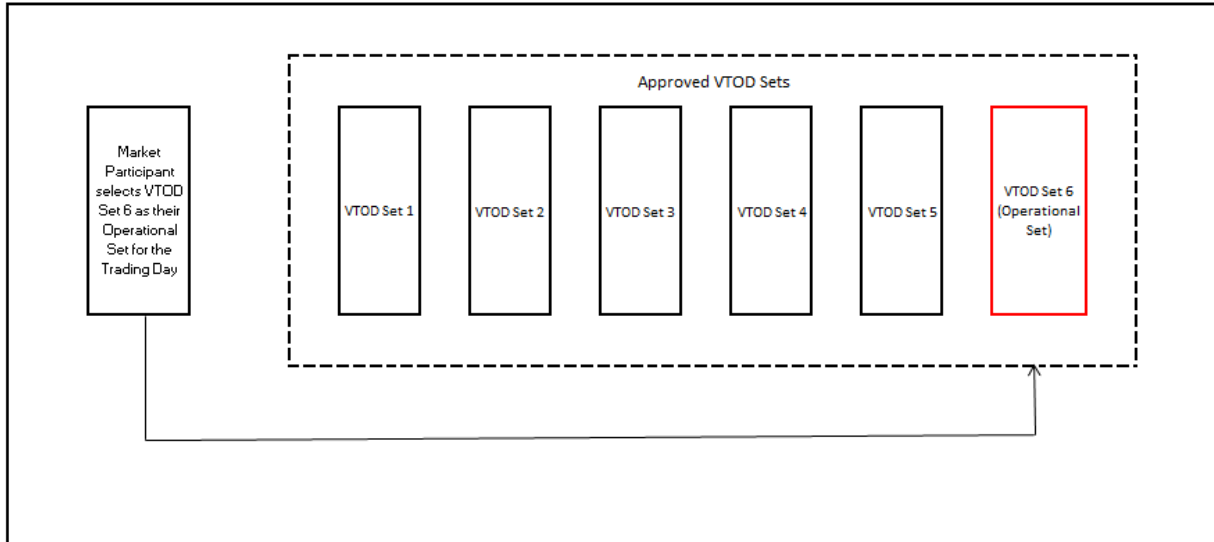
Step 2: The VTOD is approved by both the System Operator and Market Operator within the 11 Working Day timeframe.

Indicative Timing: D+11 Working Days



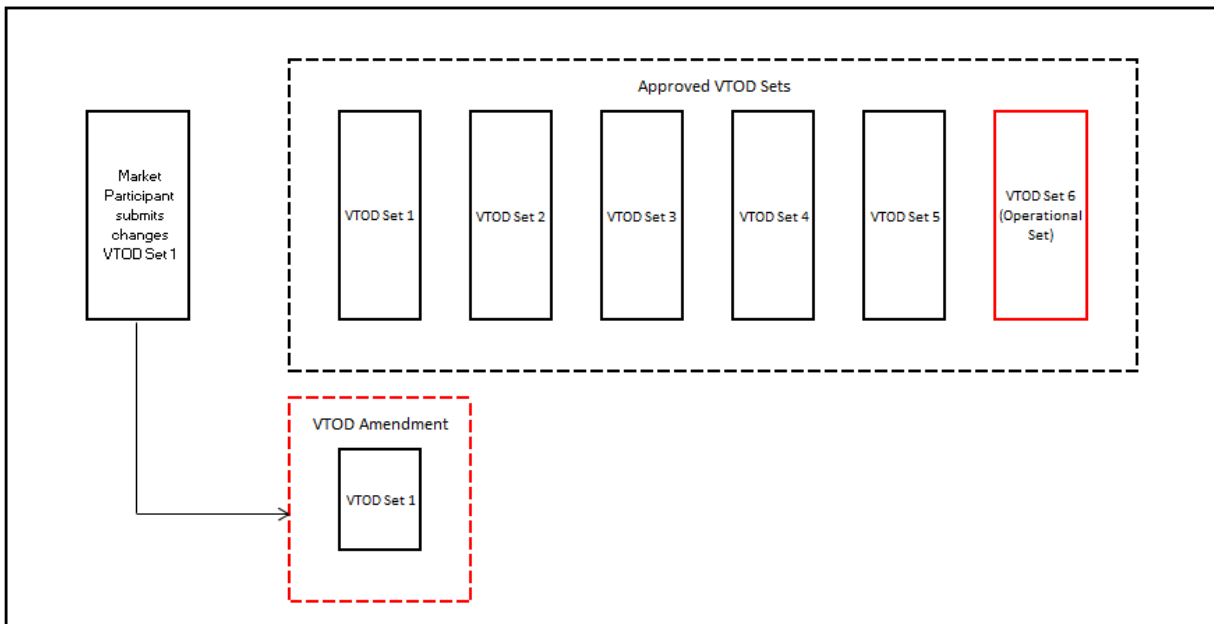
Step 3a: The Participant may select the SO and MO approved VTOD Set 6 as their operational set before GC1.

Indicative Timing: D+11 Working Days (Selecting newly approved VTOD Set 6)



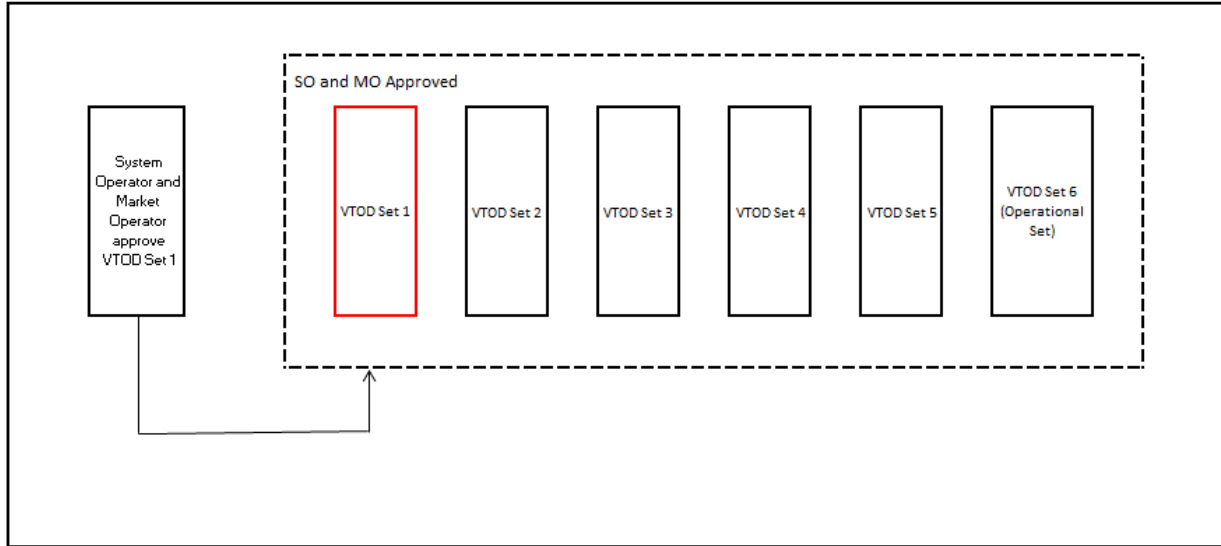
Step 3b: The Participant submits the same change to the intended operating set (i.e. VTOD Set 1).

Indicative Timing: D (The VTOD amendment to Set 1 is regarded as the first day of a new VTOD submission)



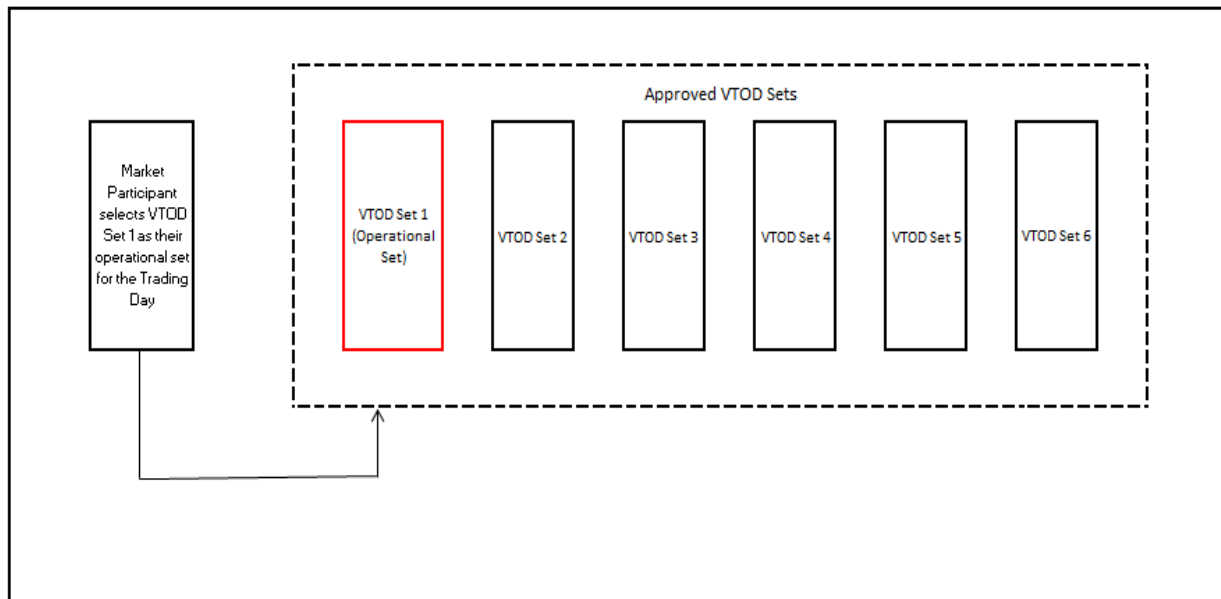
Step 4: The VTOD is approved by both the System Operator and Market Operator within the 11 Working Day timeframe.

Indicative Timing: D+11 Working Days



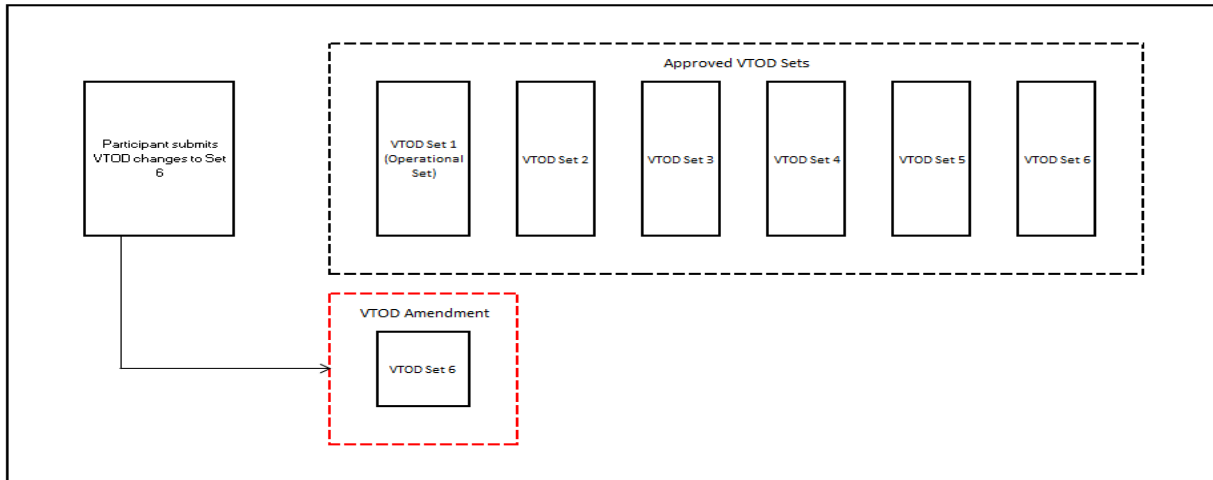
Step 5a: The Participant may select the SO and MO approved VTOD Set 1 as their operational set before GC1.

Indicative Timing: D+11 Working Days (Selecting newly approved VTOD Set 1)



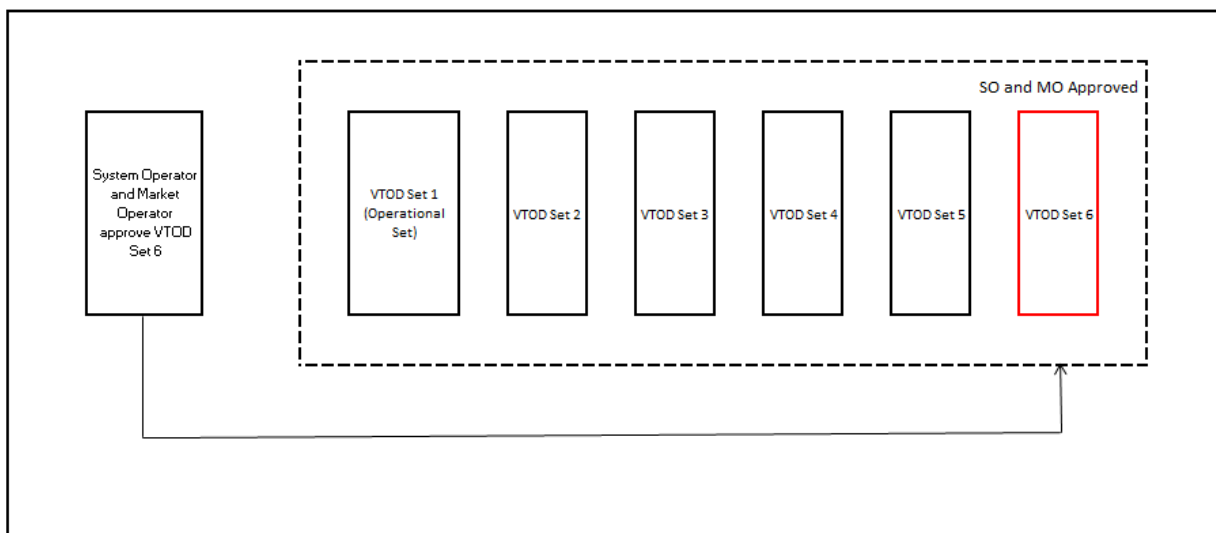
Step 5b: In order to complete the process the Participant can submit a final VTOD amendment to initial amended VTOD Set (i.e. Set 6), to reflect the initial VTOD parameters.

Indicative Timing: D (The VTOD amendment to Set 6 is regarded as the first day of a new VTOD submission)

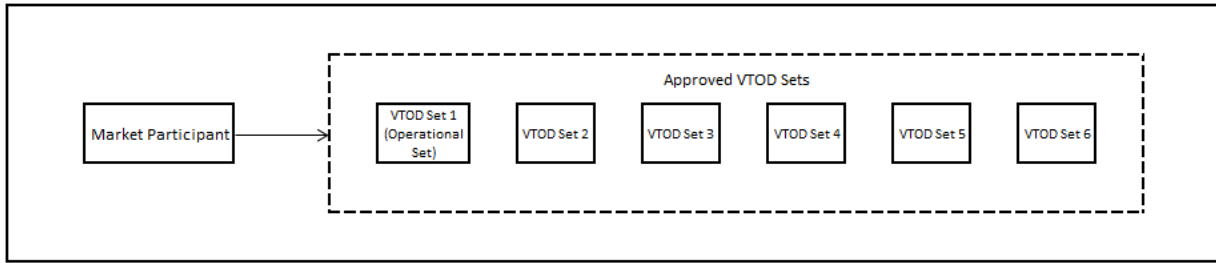


Step 6: The VTOD is approved by both the System Operator and Market Operator within the 11 Working Day timeframe.

Indicative Timing: D+11 Working Days



Step 7: The process is complete and the Participant can select from any one of the six approved VTOD Sets.

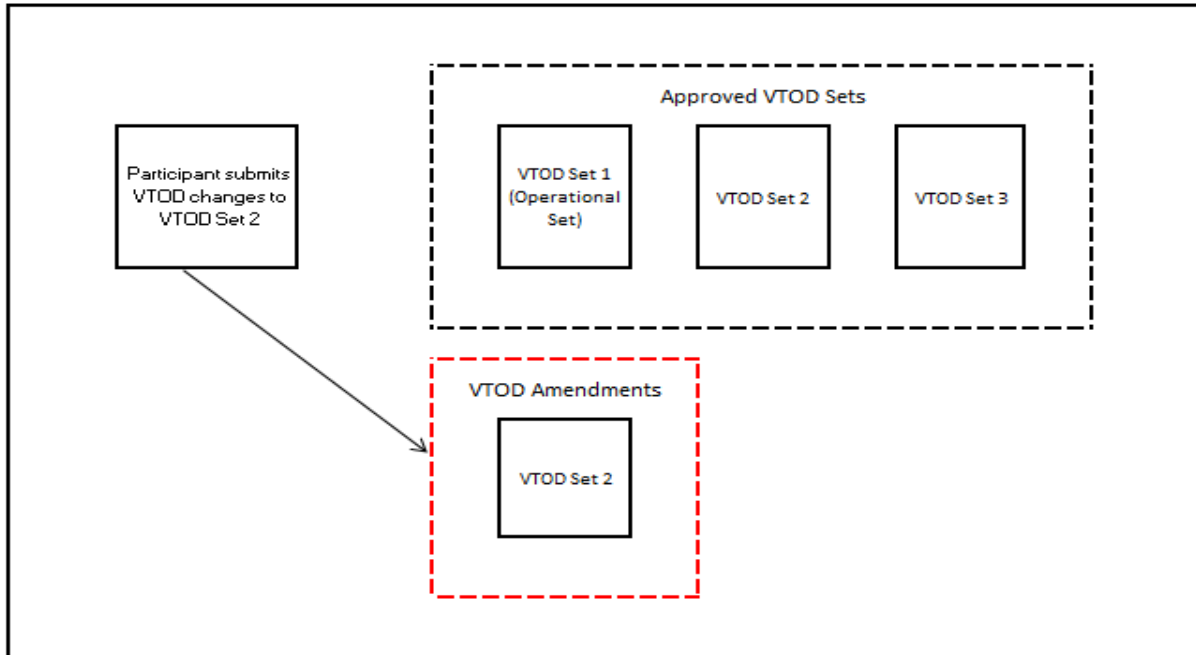


3.1 NON-OPERATIONAL VTOD SET AMENDMENT

In the below example the Participant has three approved VTOD Sets. These set of diagrams denote the standard VTOD process.

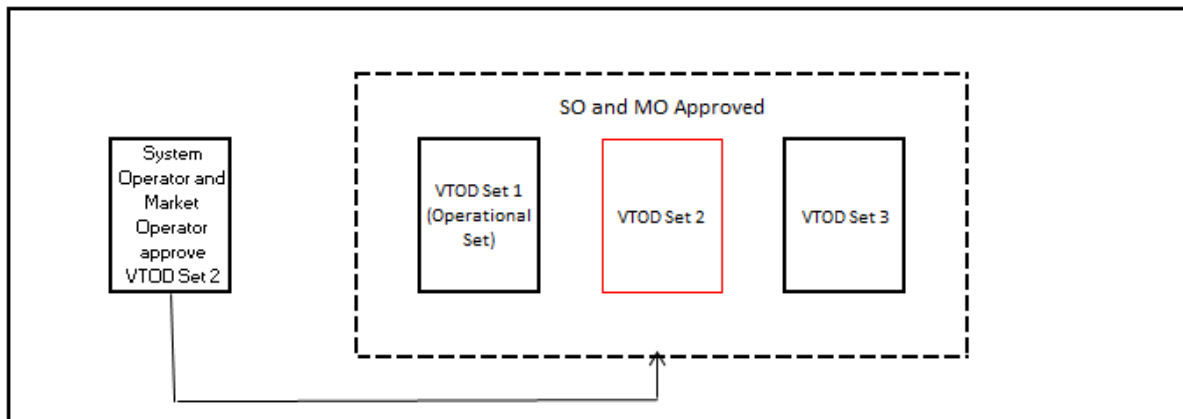
Step 1: Participant to submit changes to the applicable non-operational VTOD Set and/or add an additional VTOD Set.

Indicative Timing: D

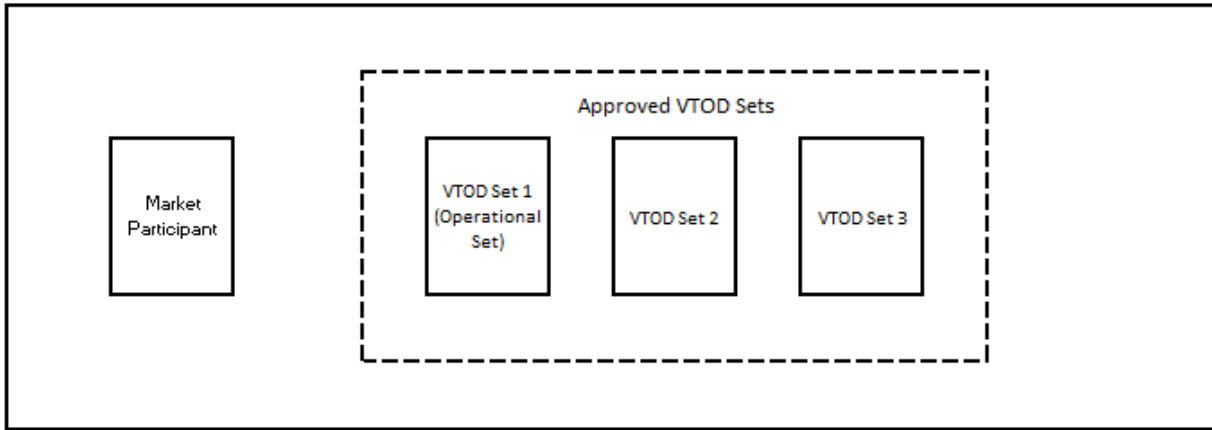


Step 2: The VTOD is approved by both the System Operator and Market Operator within the 11 Working Day timeframe.

Indicative Timing: D+11 Working Days



Step 3: The process is complete and the Participant can select from any one of the approved VTOD Sets.



4 GLOSSARY & TERMS

4.1 GLOSSARY

Term	Definition
Demand Side Unit	means one or more Demand Sites which comply individually or collectively as appropriate with the criteria set out in paragraph B.9.5.3 and is so registered by a Participant.
Gate Closure	<p>Gate Closure is the time after which particular Data Transactions may no longer be submitted and Accepted, as follows:</p> <ul style="list-style-type: none"> (a) Gate Closure 1 (GC1) in respect of a Trading Day is 13:30 on the day prior to the Trading Day (so that, for example, where a Trading Day commences at 23:00 on a Thursday, Gate Closure 1 is 13:30 on that Thursday); and (b) Gate Closure 2 (GC2) in respect of an Imbalance Settlement Period is one hour before the start of that Imbalance Settlement Period.
Generator	means a power plant or any similar apparatus that generates electricity (including all related equipment essential to its functioning as a single entity) with capabilities for delivering energy to the Transmission System or Distribution System and which is Connected to the Transmission System or Distribution System.
Market Operator	means EirGrid plc and SONI Limited solely in their respective roles as the undertakings authorised by the Regulatory Authorities to perform the Market Operator function pursuant to the Market Operator Licences and any relevant exemption, with their rights, powers, functions, obligations and liabilities under this Code in that role alone being joint and several.
System Operator	<p>means:</p> <ul style="list-style-type: none"> (a) in respect of Northern Ireland, the holder of a licence to participate in transmission granted under Article 10(1)(b) of the Electricity (Northern Ireland) Order 1992 as may be amended or replaced from time to time, and which requires the licensee to co-ordinate, and direct, the flow of electricity onto and over the Transmission System for Northern Ireland; and (b) in respect of Ireland, the holder, for the time being, of a licence granted under Section 14(1)I of the Electricity Regulation Act 1999 (Ireland) as may be amended or replaced from time to time, in its capacity as the holder of that licence. <p>References to the “System Operators” in the context of the Capacity Market or the Capacity Market Code means the System Operators in performing their responsibilities under the Capacity Market Code.</p>
Participant	means a Party or business division of a Party which at the relevant time has been designated as, or deemed to be, the “Participant” in relation to any Units which have been registered in accordance with the Code.
Party	means any person who is a party to the Framework Agreement and is thereby bound by the Code, and shall include its successors and permitted assigns.
Technical Offer Data	means technical offer data submitted in respect of a Generator Unit in accordance with Chapter D and Appendix I: “Offer Data”.
Validation Technical Offer Data	means certain Technical Offer Data items, as set out in Appendix I “Offer Data” in respect of a Generator Unit that are validated by the Market Operator and constitute a

Validation Data set.

Working Day

means a weekday which is not:

- (a) a public holiday or a bank holiday in Ireland or Northern Ireland; or
- (b) a non-processing day, as advised by the SEM Bank, in Ireland or the United Kingdom.

The term “Non-Working Day” shall be construed accordingly.

3.1 ACRONYMS & ABBREVIATIONS

Acronym	Definition
GC1	Gate Closure 1
MO	Market Operator
MPI	Market Participant Interface
SO	System Operator
TOD	Technical Offer Data
VTOD	Validation Technical Offer Data