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| **MODIFICATION PROPOSAL FORM** |
| **Proposer***(Company)* | **Date of receipt***(assigned by Secretariat)* | **Type of Proposal***(delete as appropriate)* | **Modification Proposal ID***(assigned by Secretariat)* |
| **SEMO** | **30/08/18** | **Urgent** | **MOD\_28\_18** |
| **Contact Details for Modification Proposal Originator** |
| **Name** | **Telephone number** | **Email address** |
| **Martin Kerin** |  | **Martin.Kerin@eirgrid.com** |
| **Modification Proposal Title** |
| **Ordering of Pseudo Dispatch Instructions for QBOA with the same Instruction Issue Time and Instruction Effective Time** |
| **Documents affected***(delete as appropriate)* | **Section(s) Affected** | **Version number of T&SC or AP used in Drafting** |
| **Appendices Part B** | **Appendix O** |  |
| **Explanation of Proposed Change***(mandatory by originator)* |
| As part of Certification activities, an issue was highlighted by which the Central Market Systems implement a different order of precedence for Pseudo Dispatch Instructions than is set out in the Trading and Settlement Code. The Certification review concludes that the precedence order implemented in the systems is “logical and likely to produce better outcomes”. As a result, the TSOs are proposing to update the TSC to align with the systems implementation. These changes will not result in a different outcome from applying the rules alone, but will reflect the order required in the systems to result in the same outcome as applying the rules, while aligning both the systems and the rules. |
| **Legal Drafting Change***(Clearly show proposed code change using* ***tracked*** *changes, if proposer fails to identify changes, please indicate best estimate of potential changes)* |
| 20. If multiple Pseudo Dispatch Instructions are created with the same Instruction Effective Time and Instruction Issue Time, they shall be ordered based on the following sequence of Instruction Codes:* + - * 1. The Pseudo Dispatch Instruction corresponding to the latest Dispatch Instruction or Instruction Combination Code ordered in accordance with paragraph 19;
				2. PISP;
				3. POFF; and
				4. PCOD.
 |
| **Modification Proposal Justification***(Clearly state the reason for the Modification)* |
| The proposal changes to the order of precedence for Pseudo Dispatch Instructions with the same Issue Time and Effective Time. There are a large number of permutations and combinations for examples of circumstances where such a situation can arise, including:* When a Target Instruction Level is on a half hour boundary, where both a PMWO and a PISP Pseudo Dispatch Instruction would appear to be applicable;
* Where a unit which has been instructed to desynchronise and has their Minimum Off Time completed, but at that same minute they resubmit Commercial Offer Data and have an FPN profile which moves from zero to non-zero, where a PDES, a POFF and a PCOD Pseudo Dispatch Instruction would all appear to be applicable, and if this were to occur on a half hour boundary then a PISP Pseudo Dispatch Instruction would also appear to be applicable.

In such circumstances, the use of any of the Pseudo Dispatch Instructions will result in the closure of the current instruction profile back to the previous instruction profile or FPN, which is the intended outcome in the rules. Therefore the order of preference would not have a material impact on the calculation of results as implied through applying the Code rules alone.However, the logic within the Central Market Systems relies on a particularly ordering to determine the correct Pseudo Dispatch Instructions that should be created in various scenarios. Having the correct Pseudo Dispatch Instruction code for the correct scenario is important because there is logic in the systems which process profiles and subsequent instructions differently depending on the code type of the Pseudo Dispatch Instruction. For example, if a Target Instruction Level for a MWOF Dispatch Instruction is reached on a half hour boundary, the Pseudo Dispatch Instruction related to MWOF (PMWO) should be created instead of the Pseudo Dispatch Instruction related to half hour boundaries (PISP), because the system logic creates the profile for the MWOF Dispatch Instruction by referencing the Target Instruction Level and Instruction Effective Time data for a PMWO Pseudo Dispatch Instruction. If the PISP Pseudo Dispatch Instruction were chosen instead, the system would have insufficient information to complete the profile for the MWOF Dispatch Instruction as it would be searching for the PMWO code and would not find it.In summary, this modification will have no impact on the outcomes that would result from applying the rules. However, the rules describe the creation of profiles and pseudo dispatch instructions in a slightly different way to the exact way in which they are implemented in systems, which relies on information such as the code of the Pseudo Dispatch Instruction in order to correctly create other subsequent Pseudo Dispatch Instructions and in order to correctly determine the profiles to be used in the calculation of each QBOA. Therefore this change is required solely to align the rules with the process required by the systems to give the same outcome that is described in the rules. |
| **Code Objectives Furthered***(State the Code Objectives the Proposal furthers, see Section 1.3 of T&SC for Code Objectives)* |
| This Modification furthers Code Objectives A.2.1.4(a) and A.2.1.4(e):*(a) to facilitate the efficient discharge by the Market Operator of the obligations imposed upon it by its Market Operator Licences;**(e) to provide transparency in the operation of the Single Electricity Market;* |
| **Implication of not implementing the Modification Proposal***(State the possible outcomes should the Modification Proposal not be implemented)* |
| The Trading and Settlement Code will not implement the correct order of precedence, which is already implemented in the Central Market Systems. Changing the system towards the current drafting of the Code would result in incorrect QBOA calculations, while the current implementation creates the correct QBOA calculations, just with a misalignment in this aspect of the Code. |
| **Working Group***(State if Working Group considered necessary to develop proposal)* | **Impacts***(Indicate the impacts on systems, resources, processes and/or procedures; also indicate impacts on any other Market Code such as Capacity Market Code, Grid Code, Exchange Rules etc.)* |
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| ***Please return this form to Secretariat by email to*** ***modifications@sem-o.com*** |

**Notes on completing Modification Proposal Form:**

1. **If a person submits a Modification Proposal on behalf of another person, that person who proposes the material of the change should be identified on the Modification Proposal Form as the Modification Proposal Originator.**
2. **Any person raising a Modification Proposal shall ensure that their proposal is clear and substantiated with the appropriate detail including the way in which it furthers the Code Objectives to enable it to be fully considered by the Modifications Committee.**
3. **Each Modification Proposal will include a draft text of the proposed Modification to the Code unless, if raising a Provisional Modification Proposal whereby legal drafting text is not imperative.**
4. **For the purposes of this Modification Proposal Form, the following terms shall have the following meanings:**

**Agreed Procedure(s): means the detailed procedures to be followed by Parties in performing their obligations and functions under the Code as listed in either Part A or Part B Appendix D “List of Agreed Procedures”. The Proposer will need to specify whether the Agreed Procedure to modify refers to Part A, Part B or both.**

**T&SC / Code: means the Trading and Settlement Code for the Single Electricity Market. The Proposer will also need to specify whether all Part A, Part B, Part C of the Code or a subset of these, are affected by the proposed Modification;**

**Modification Proposal: means the proposal to modify the Code as set out in the attached form**

**Derivative Work: means any text or work which incorporates or contains all or part of the Modification Proposal or any adaptation, abridgement, expansion or other modification of the Modification Proposal**

**The terms “Market Operator”, “Modifications Committee” and “Regulatory Authorities” shall have the meanings assigned to those terms in the Code.**

**In consideration for the right to submit, and have the Modification Proposal assessed in accordance with the terms of Section 2 of Part A or Chapter B of Part B of the Code (and Part A Agreed Procedure 12 or Part B Agreed Procedure 12) , which I have read and understand, I agree as follows:**

**1. I hereby grant a worldwide, perpetual, royalty-free, non-exclusive licence:**

* 1. **to the Market Operator and the Regulatory Authorities to publish and/or distribute the Modification Proposal for free and unrestricted access;**
	2. **to the Regulatory Authorities, the Modifications Committee and each member of the Modifications Committee to amend, adapt, combine, abridge, expand or otherwise modify the Modification Proposal at their sole discretion for the purpose of developing the Modification Proposal in accordance with the Code;**
	3. **to the Market Operator and the Regulatory Authorities to incorporate the Modification Proposal into the Code;**

**1.4 to all Parties to the Code and the Regulatory Authorities to use, reproduce and distribute the Modification Proposal, whether as part of the Code or otherwise, for any purpose arising out of or in connection with the Code.**

**2. The licences set out in clause 1 shall equally apply to any Derivative Works.**

**3. I hereby waive in favour of the Parties to the Code and the Regulatory Authorities any and all moral rights I may have arising out of or in connection with the Modification Proposal or any Derivative Works.**

**4. I hereby warrant that, except where expressly indicated otherwise, I am the owner of the copyright and any other intellectual property and proprietary rights in the Modification Proposal and, where not the owner, I have the requisite permissions to grant the rights set out in this form.**

**5. I hereby acknowledge that the Modification Proposal may be rejected by the Modifications Committee and/or the Regulatory Authorities and that there is no guarantee that my Modification Proposal will be incorporated into the Code.**