

Single Electricity Market

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| Final REcommendation Report  Mod\_33\_18 update to unit under test process v2  24 May 2019 |

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Document History

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| **Version** | **Date** | **Author** | **Comment** |
| 1.0 | 24 May2019 | Modifications Committee Secretariat | Issued to Modifications Committee for review and approval |
| 2.0 | 07 June 2019 | Modifications Committee Secretariat | Issued to Regulatory Authorities for final decision |

Reference Documents

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| --- |
| **Document Name** |
| [Trading and Settlement Code](http://www.sem-o.com/MarketDevelopment/MarketRules/TSC.docx) |
| [Modification Proposal Form](https://www.sem-o.com/documents/market-modifications/Mod_33_18/Mod_33_18UpdatetoUnitUnderTestProcess.docx) |
| [Presentation 1](https://www.sem-o.com/documents/market-modifications/Mod_33_18/Mod_33_18UpdatetoUnitUnderTestProcess.pptx) |
| [Modification Proposal Form v2](https://www.sem-o.com/documents/market-modifications/Mod_33_18/Mod_33_18UpdatetoUnitUnderTestProcessv2.0.docx) |
| [Presentation 2](https://www.sem-o.com/documents/market-modifications/Mod_33_18/Mod_33_18UpdatetoUnitUnderTestProcess2.0.pptx) |
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# MODIFICATIONS COMMITTEE RECOMMENDATION

## Recommended for approval– unanimous Vote

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| --- | --- | --- |
| **Recommended for Approval by Unanimous Vote** | | |
| Siobhan O’Neill | Interconnector Member | Approve |
| Jim Wynne | Supplier Member | Approve |
| Robert McCarthy | DSU Alternate | Approve |
| Cormac Daly | Generator Member | Approve |
| Rochelle Broderick | Supplier Alternate | Approve |
| William Carr | Generator Alternate | Approve |
| Sean McParland | Generator Alternate | Approve |
| Sinead O’Hare | Generator Member | Approve |
| William Steele | Supplier Member | Approve |
| Julie Anne Hannon | Supplier Member (Chair) | Approve |

# Background

This Modification Proposal was raised by SEMO and was received by the Secretariat on the 28th March 2019. This proposal was raised for Meeting 88 but not discussed due to a full agenda. It was then discussed at Meeting 89 and voted on at Meeting 90 on the 11 April 2019.

Details of the process for Generator Units to apply for and reflect Unit Under Test status in Part B are currently incomplete and inaccurate in that they contain reference to steps which do not occur during the process, reference detail which has not been included in some Code body paragraphs and also in that Agreed Procedure 4 details the submissions required to cancel Under Test status but not those required to apply Under Test status. This is a result of the provisions from Part A being amended to reflect the process under Part B whenever substantial elements of how the works in the market systems were unknown.

This proposal aims to correct any inaccuracies and address any omissions in the rules for this process as currently drafted to ensure clarity in how the process works for both operators and Market Participants.

**3A.) justification of Modification**

This proposal is required due to inaccuracies and omissions in the rules detailing the Unit Under Test process.

**3B.) Impact of not Implementing a Solution**

If this proposal is not implemented the rules governing the Unit Under Test process continue to be inaccurate and inconsistent.

**3c.) Impact on Code Objectiv****es**

1. to provide transparency in the operation of the Single Electricity Market;

# Working Group and/or Consultation

N/A

# impact on systems and resources

No system or process impacts anticipated.

# Impact on other Codes/Documents

N/A

# MODIFICATION COMMITTEE VIEWS

## Meeting **89 – 20 February 2019**

The proposer delivered a [presentation](https://www.sem-o.com/documents/market-modifications/Mod_33_18/Mod_33_18UpdatetoUnitUnderTestProcess.pptx) explaining that the Unit Under Test Process in the Trading and Settlement Code (T&SC) does not accurately reflect the actual process, as a result of changes over time and particularly as a result of I-SEM. Testing Tariffs have changed significantly post I-SEM and this Modification Proposal was raised to ensure the T&SC accurately details the process.

Discussion took place regarding the Grid Code having priority over the T&SC. It was suggested that it was preferable that a change could be effected to the T&SC rather than the Grid Code. There was understanding of the need for this Modification Proposal but concerns relating to the legal drafting were raised as the term ‘Under Test Flag’ is not defined in the Grid Code. RA Member expressed the opinion that this solution may be over engineered. MO Alternate confirmed that, although it seems that some of the text is out of place in the T&SC because it refers to the Grid Code, it is necessary in the context of Physical Notification submission which is detailed in the T&SC and Testing Tariffs application which is also detailed in the T&SC. A lack of reference to Test flags and their submission would create a gap in the Code. TSO Alternate advised that in fact the aim of this Modification Proposal was to provide a simplified approach and to offer transparency to PTs.

The legal drafting was discussed at length with alternative drafting suggested that would be satisfactory. It was agreed that this proposal is deferred and the Proposer will develop Version 2.0 encompassing the suggested legal drafting discussed.

Legal drafting changes discussed –

* Para 8 & Para 9 (re Appendix F)– remove text ‘in accordance with the Grid Code’
* Para 8 needs to be linked to Para 7 (to ensure readers understand it relates to test flag under the grid code) with additional wording in paragraph 8 such as ‘for the purpose of fulfilling paragraph 7’
* D.7.3.2 Powers for TSO to grant Under Test status are given under Grid Code and not Trading and Settlement Code therefore remove wording about TSOs having vires in granting status at beginning of D.7.3.2 and generalise which units cannot be given under test status
* D7.3.6 leave wording as is in proposal not in slide pack to clarify it is the MO that “shall” record the information received from the TSO (not that the TSO has any powers under the Code in this regard)

## Meeting **90 – 11 april 2019**

The proposer delivered a [presentation](https://www.sem-o.com/documents/market-modifications/Mod_33_18/Mod_33_18UpdatetoUnitUnderTestProcess2.0.pptx) on the version 2 of this proposal confirming that changes were incorporated based on the feedback provided. References to the System Operator were removed as were some references to the Grid Code. Also some typos were addressed in the presentation that will need to be incorporated in the FRR.

It was queried why unit under test does not apply to non dispatchable non controllable unit types and the proposer confirmed that is was intentional because the System Operators have no control over units which are not dispatchable so that it is not necessary for them to formally request testing and submit a test profile.

# Proposed Legal Drafting

As set out in Appendix 1 plus minor changes highlighted below:

**AP04 Section 3.1 Procedural Step 1**

Submit Generator Unit Under Test Request by email including proposed start and end dates and proposed testing profile as specified by the System Operator

**AP04 Table 4 Data Transaction Approval Requirements – Physical Notification Data record**

**Table 4: Data Transaction Approval Requirements**

**….**

|  |  |  |
| --- | --- | --- |
| BMI | Physical Notification Data | XXX  Each From MW Level and To MW Level in a PND submission cannot be less than the Registered Minimum Output for the Unit, and cannot be greater than the Maximum Generation for the Unit.  Each From MW Level and Time in a PND submission must have the same values as the immediately previous To MW Level and Time, with the exception of the first From MW Level and Time for the submission.  The first From Time in a PND submission must be at the start of the earliest Open Imbalance Settlement Period in the relevant Trading Day.  The final To Time in a PND submission must be at the later of the end of the final Imbalance Settlement Period in the relevant Trading Day, or the end of the final Imbalance Settlement Period in the latest Trading Day for which the gate for the submission of offers to the Day-ahead Market has closed.  Where a Generator Unit Under Test Request has been submitted to and agreed with the relevant System Operator, the Under Test Flag can be set to True for each PND submission that falls within the agreed Under Test Start Date and Time and Under Test End Date and Time. |

# LEGAL REVIEW

N/A

# IMPLEMENTATION TIMESCALE

It is proposed that this Modification implemented as the Modifications Committee have Recommended it for Approval and on a trading day following receipt of the RA Decision.

# Appendix 1: Mod\_33\_18 update to unit under test process v2

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **MODIFICATION PROPOSAL FORM** | | | | | |
| **Proposer**  *(Company)* | **Date of receipt**  *(assigned by Secretariat)* | | **Type of Proposal**  *(delete as appropriate)* | | **Modification Proposal ID**  *(assigned by Secretariat)* |
| **TSO\_EirGrid** | **28 March 2019** | | **Standard** | | **MOD\_33\_18 v2** |
| **Contact Details for Modification Proposal Originator** | | | | | |
| **Name** | | **Telephone number** | | **Email address** | |
| **Patrick O’Neill** | |  | | **patrick.oneill@eirgrid.com** | |
| **Modification Proposal Title** | | | | | |
| **Update to Unit Under Test Process** | | | | | |
| **Documents affected**  *(delete as appropriate)* | | **Section(s) Affected** | | **Version number of T&SC or AP used in Drafting** | |
| **T&SC Part B**  **Glossary Part B**  **Appendice F Part B**  **Agreed Procedure 4 Part B** | | **Part B Section D.7.3**  **Part B Appendices F and J**  **Part B Glossary Definitions related to Under Test status**  **Part B Agreed Procedure 4 Sections 2.4 and 3** | | **Version 20** | |
| **Explanation of Proposed Change**  *(mandatory by originator)* | | | | | |
| Details of the process for Generator Units to apply for and reflect Unit Under Test status in Part B are currently incomplete and inaccurate in that they contain reference to steps which do not occur during the process, reference detail which has not been included in some Code body paragraphs and also in that Agreed Procedure 4 details the submissions required to cancel Under Test status but not those required to apply Under Test status. This is a result of the provisions from Part A being amended to reflect the process under Part B whenever substantial elements of how the works in the market systems were unknown.  This proposal aims to correct any inaccuracies and address any omissions in the rules for this process as currently drafted to ensure clarity in how the process works for both operators and Market Participants. | | | | | |
| **Legal Drafting Change**  *(Clearly show proposed code change using* ***tracked*** *changes, if proposer fails to identify changes, please indicate best estimate of potential changes)* | | | | | |
| ***Changes to main body of the Code Part B***      4. 7. 3. Generator Units Under Test          1. The relevant System Operator may grant Generator Units the status of ‘Under Test’ for a limited period under the terms of the relevant Grid Code.          2. Notwithstanding paragraph D.7.3.1, the status of Under Test shall not be granted to Generator Units which have Priority Dispatch and which are not Dispatchable, Generator Units which are not Dispatchable and not Controllable (with the exception of Interconnector Error Units), or Interconnector Residual Capacity Units. Any request from any such Units shall be deemed returned whether or not a response is received from the System Operator.          3. Prior to the submission of an Under Test Flag under paragraph D.7.3.4, an eligible Participant shall submit a Generator Unit Under Test Request which shall propose a Unit Under Test Start Date and Time and a Unit Under Test End Date and Time as specified in Appendix F “Other Communications” and in accordance with Agreed Procedure 4 “Transaction Submission and Validation”.          4. In order for a Generator Unit to acquire Under Test status under this Code, an eligible Participant shall submit an Under Test Flag to the relevant System Operator as part of its Physical Notification Data which shall identify the relevant Physical Notification Quantities to be considered Under Test. The submission of this data shall constitute an application by the Participant for Under Test status which can be rejected by the System Operator in accordance with Agreed Procedure 4 “Transaction Submission and Validation”.          5. The Physical Notification Quantities for a Generator Unit Under Test within the Physical Notification Data shall reflect the pattern of operation agreed as part of the Generator Unit Under Test Request process in accordance with paragraph D.7.3.3.          6. The Market Operator shall record the Generator Unit Under Test status under this Code for the Imbalance Settlement Periods between the Physical Notification Quantity times associated with the Under Test Flag, starting on the Imbalance Settlement Period in which the Under Test Flag first applies, and ending on the Imbalance Settlement Period in which the Under Test Flag last applies in order to apply the appropriate Testing Tariffs.   ***Changes to Glossary***   |  |  | | --- | --- | |  |  | | **Generator Unit Under Test Request** | means a notice submitted by a Generation Participant to the System Operator detailing its intention to apply for the status of Under Test as detailed in Appendix F: “Other Communications”. | | **Under Test** | means the under test status accorded to certain Generator Units by the relevant System Operator as set out in section D.7.3. | | **Under Test Flag** | is a flag which indicates the times where a Generator Unit is Under Test in the Physical Notification Data submission. |   ***Changes to Appendix F: ‘Other Communications’***  Generator Unit Under Test Notice  ….   * + - 1. Agreed Procedure 4 "Transaction Submission and Validation" sets out the details of Generator Unit Under Test Requests and Under Test Flags, following the principles in paragraphs 7,8 and 9 of this Appendix below.       2. Each Participant shall submit a Generator Unit Under Test Request to the System Operator in accordance with the Grid Code in advance of Unit Under Test Start Date. The Generator Unit Under Test Request will specify in all cases Unit Under Test Start Date and time, Unit Under Test End Date and time and the Generator Unit Under Test and any such requirements as specified in the Grid Code.       3. For the purpose of fulfilling paragraph 7, participants shall submit an Under Test Flag to the System Operator as set out in paragraph D.7.3.4. The Under Test Flag will identify the Unit Under Test Start Date and time and the Unit Under Test End Date and time in the Physical Notification Data submission. The Market Operator will ensure that Physical Notification Data can be submitted by Participants through the Central Market Systems.       4. The System Operator for the Currency Zone in which the Participant is registered shall validate the Physical Notification Data ~~Generator Unit Under Test Notice~~ and confirm to the Market Operator whether the Generator Unit ~~Under Test in accordance with Appendix F “Other Communications”~~ is subject to Testing Tariffs.   ***Changes to Appendix J: ‘Data Transactions from Market Operator to System Operator’***   * 1. Registration Data   2. ….   ***Changes to AP04: ‘Transaction Submission and Validation’***  …      2.4 Approval of Data Transactions  This section describes the timelines associated with the approval of different Data Transactions and their Elements. Various Data Transactions contain Elements which require more time than others for Market Operator approval (including System Operator approval as appropriate).  **Table 1: Data Transaction Approval Requirements**  **….**   |  |  |  | | --- | --- | --- | | BMI | Physical Notification Data | XXX  Each From MW Level and To MW Level in a PND submission cannot be less than the Registered Minimum Output for the Unit, and cannot be greater than the Maximum Generation for the Unit.  Each From MW Level and Time in a PND submission must have the same values as the immediately previous To MW Level and Time, with the exception of the first From MW Level and Time for the submission.  The first From Time in a PND submission must be at the start of the earliest Open Imbalance Settlement Period in the relevant Trading Day.  The final To Time in a PND submission must be at the later of the end of the final Imbalance Settlement Period in the relevant Trading Day, or the end of the final Imbalance Settlement Period in the latest Trading Day for which the gate for the submission of offers to the Day-ahead Market has closed.  Where a Generator Under Test request has been submitted to and agreed with the relevant System Operator, the Under Test Flag can be set to True for each PND submission that falls within the agreed Under Test Start Date and time and Unit Under Test End Date and time. |   …. | | | | | |



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| 1. **Procedural Steps**    1. Submission, approval and rejection of a Generator Unit Under Test Request and Under Test Flag  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | **Step** | **Procedural Step** | **Timing** | **Method** | **By/From** | **To** | |  | Submit Unit Under Test Request by email including proposed start and end dates and proposed testing profile as specified by the System Operator | As per Grid Code requirements or any other relevant SO documentation | Email | Participant | System Operators | |  | Review the submission and issue approval or rejection as appropriate. | As per Grid Code requirements or any other relevant SO documentation | Email | System Operators | Participant | |  | Submit Under Test Flag as Part of Physical Notification Data | From Gate Opening to Gate Closure 2 | Update BMI | Participant | System Operators | |  | If SO considers the Under Test Flags submitted as valid, these will be accepted. If no acceptance is received by the SO, the Under Test Flags in the Physical Notification Data is automatically rejected. | As received | Update BMI | System Operators | Participant | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |  |  |  |  |  |  | |

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| **Modification Proposal Justification**  *(Clearly state the reason for the Modification)* | |
| This proposal is required due to inaccuracies and omissions in the rules detailing the Unit Under Test process. | |
| **Code Objectives Furthered**  *(State the Code Objectives the Proposal furthers, see Section 1.3 of Part A and/or Section A.2.1.4 of Part B of the T&SC for Code Objectives)* | |
| * + - * 1. 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)* | |
| If this proposal is not implemented the rules governing the Unit Under Test process continue to be inaccurate and inconsistent. | |
| **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 Marker Code, Grid Code, Exchange Rules etc.)* |
| No | No impacts anticipated |
| ***Please return this form to Secretariat by email to*** [*balancingmodifications@sem-o.com*](mailto:balancingmodifications@sem-o.com) | |