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RE: SEM-24-054 - Consultation on SEM Scheduling and Dispatch Parameters 2025 (“the Consultation”)

Bord Gáis Energy (BGE) welcomes the opportunity to respond to the Consultation¹ on SEM Scheduling and Dispatch Parameters 2025 (SEM-24-054) relating to the proposed values for the Long Notice Adjustment Factor (LNAF) and System Imbalance Flattening Factor (SIFF) for 2025.

In principle the LNAF and SIFF parameters should be non-zero in value in that, that is what was expected when they were being considered in the market design phases. The role of these parameters was to make it less attractive to call on units too early so as to allow the market to decide the outcome as much as possible.

Neither the TSOs report to the Regulators (SEM-24-054a) nor the Consultation consider what needs to change for the LNAF and SIFF parameters to be non-zero as originally intended in the market design. We believe the SEMC decision on this Consultation should instruct the TSOs to, from next year, start including in their annual report² a section describing the circumstances needed to for LNAF and SIFF to become non-zero. This should include a description of any upgrades that would be required to the TSO systems to enable this. We believe the proposed section should remain an enduring requirement of the annual report to the Regulators until a move to non-zero parameters can be achieved.

If the TSOs already know of planned system changes which could enable the introduction non-zero parameters in the future, this should be communicated to industry before next year’s report.

When the circumstances are in place to enable non-zero parameters, a full impact assessment should be carried out before any move is made. This would be to confirm the move is still in the best interest of consumers, which includes the need to have a competitive and investable wholesale market.

¹ <https://www.semcommittee.com/news/scheduling-and-dispatch-parameters-consultation-paper-2025>

² The report required under Condition 10A of EirGrid’s Transmission System Operator (TSO) Licence and Condition 22A of SONI’s Transmission System Operator Licence proposing parameters to be applied to the Scheduling and Dispatch process.

I hope you find this response useful. Please do not hesitate to contact me should you wish to discuss any aspect in more detail.

Yours sincerely

Helen Stack
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Bord Gáis Energy