



NETWORKS

ESB Networks Submission:

**Integrated Single Electricity Market (I-SEM) Capacity
Remuneration Mechanism Detailed Design**

SEM-15-044 – I-SEM Consultation Paper

17th August 2015

1. Introduction

ESB Networks welcomes the opportunity to respond to the SEM Committee’s I-SEM ‘Capacity Remuneration Mechanism Detailed Design Consultation Paper’.

The submission includes the comments and suggestions of ESB Networks, as a neutral market facilitator, on the proposals and the considerations in the consultation.

ESB Networks looks forward to continued engagement on this topic and is open to further discussion and involvement in accommodating the SEM Committee’s proposed direction of I-SEM.

2. Submission

ESB Networks has considered the following items as relevant for comment.

Section 3. PRODUCT DESIGN

ESB Networks believes that there is an apparent requirement for metered data to support the Capacity Remuneration Mechanism. This implies that there may be an impact on Meter Data Providers; however, it is not clear to what extent it will impact on ESB Networks. For example, under the SEM, ESB Networks sends a single file of data to SEMO which is used for all wholesale market settlement purposes and for which ESB Networks is a Meter Data Provider of non-price effecting data. The file submissions and timelines are documented in Agreed Procedure 16 for the SEM:

- For the I-SEM. Will ESB Networks be required to send one file of data to the TSO, and the Imbalance Settlement Operator, and to the entity that will be responsible for the settlement of the Capacity Remuneration Mechanism
- Or will there be any new requirement for ESB Networks for additional files of data

Section 4.10 TREATMENT OF AGGREGATORS AND PPA PROVIDERS

ESB Networks is of the opinion that should there be a change in the De Minimis Threshold then there will be movement between Participant and Non Participant Generation which will need to be reflected in the processing requirements and registration of these Units in the Retail Market as well as the I-SEM.

The full impact of these changes will depend on the numbers of Generators that make the changeover as well as other changes that may arise because of changing Registration requirements and potentially Price Effecting generation for I-SEM and which are not yet fully understood by ESB Networks.

Therefore, for planning purposes it is necessary to highlight all relevant changes at the earliest possible opportunity. ESB Networks suggest, from experience in the SEM, it is of benefit if all changes that are required are reflected in time for Market Trials.