

MEETING:	System Services Code Working Group Meeting #5 March 2025
DATE AND TIME:	12 th March 2025 09:30-11:00
PARTICIPANTS:	<p> Brian Mongan (BM), FERA Cian Fitzgerald (CF), Energia Harry Molloy (HM), EPUKI Paraic Higgins (PH), ESB Andrew Burke (AB), WEI Jessica Branigan (JBr), Matheson / IESA Patrick Liddy (PL), DRAI Paul McGuckin (PMcG), Mutual Energy Peter Brett (PB), Eco Power Supply Ltd. Eoghan Cudmore (EC), Bord Gais Energy Michael-Allan Millar (MAM), SSE Bronagh McKeown (BMcK), UR Donna Maye (DM), UR Sumona Mukerjee (SM), CRU Jason Kennedy, (JK), CRU Andrew Crawford (AC), EirGrid Brendan O'Sullivan (BOS), EirGrid Carole Devlin (CD), EirGrid Joe Deegan (JD), EirGrid Kasra Haji Bashi (KHB), EirGrid Calvin McCurley (CMcC), SONI Gerard Hanlon (GH), EirGrid Niamh Delaney (ND), EirGrid Sarah Friedel (SF), SONI David Clark (DC), FASS Programme Team Rachel Plomp (RP), FASS Programme Team Daniel Marshman (DMa), Market Reform Brendan Ring (BR), Market Reform </p>
ABSENT:	<p> Peter Frampton (PF), VPI Dylan Ashe (DA), CRU Aidan Byrne (ABy), EirGrid Michael Atcheson (MA), SONI Harry Enwereonu (HE), CRU Eoin Farrell (EF), FASS Programme Team </p>
PREPARED BY:	David Clark

Meeting Context

FASS SS Code Working Group Meeting was held virtually. Meeting facilitated by Carole Devlin.

Agenda:

- Welcome and Introduction
- Agreed Procedures
- Revised Layout for Auction Design Sections of PEV 2
- AOB

Minutes

Welcome and Introduction

- CD welcomed the group and voiced over the Agenda, Scope, Table of Contents and Market Rules & Code Development PIR extract (slides 2-5).
- CD noted the TSOs hope to have the Volume Forecasting Methodology and System Services Supplier Charge decisions shortly and therefore work can then commence on these topics.

Agreed Procedures - Registration

- CD talked the group through the Registration Agreed Procedure content, highlighting that for the Agreed procedures the Trading and Settlement Code (T&SC) formed the basis for the System Services (SS) Code. CD added that highlighted clauses in SS Code are references to T&SC and have kept it as close to T&SC as possible so far.
- CD added the key difference between T&SC and SS Codes is that accession and party registration are separate processes in SS Code. Sections of T&SC have been removed where they are not relevant to the SS Code.
- CD noted for Stage 1 of Unit Registration; the technical information may be superseded later as part of qualification phase.
- AB queried if the collateral here is separate and distinct from Balancing Market or is it a shared pot with Balancing Market and System Services. BOS clarified it will be separate.
- BM noted pre-read materials were only sent on Thursday giving 3 working days and not 5 working days as per the terms of reference. CD apologised for the delay and will endeavour to send out earlier going forward.
- BM asked if T&SC and SS Codes are separate and was concerned, they are being linked heavily together. CD responded that the T&SC is well established, and that industry had previously shared a preference for leveraging existing processes from T&SC and DS3 as necessary. BM added further, the SS Code is making reference to requirement to be registered as a participant in T&SC. CD clarified the TSOs are trying to follow DS3 process for now, under DS3 Arrangements most units are required to be registered under T&SC. In absence of having full visibility of what the requirements will be, the TSOs are aligning with DS3 requirements and will revisit when there is further detail available for FASS.
- PH noted they struggled to get through the pre read material in time. Requested if Working Group members can get a copy of the 3 Agreed Procedures which include tracked changes with T&SC. CD agreed this is possible and that TSOs will send after working group.
- PH queried if TSOs will make changes in T&SC if parts of the T&SC need to be amended to align to the SS Code, so it is clear to industry to know which code to cross check. ND highlighted that the TSOs align with the Grid Code unless there was a need to be different and proposed that a similar principle is followed here.
- PH queried what data change would require opening of the qualification process rather than registration. CD replied that any changes to technical characteristics that change commercial values would have to go through qualification process as is practice for current DS3 arrangements.
- PH queried use of "PT" in SS Code as it's participant in T&SC but Service Provider in SS Code? DMA added this is a placeholder and TSOs will consider the naming

conventions and use of one or the other as part of detailed design. The TSOs will provide an update on this when more information is available.

- PH asked if qualification and registration agreed procedures aligned with the SEMC HLD requirement [Section 3.2.3 of SEMC HLD (SEM-22-012)] which requires that the TSOs endeavour to complete the qualification/registration process 90 days from receipt of a valid application? CD noted that the TSOs had considered this and believe it should align but we will take this action away to confirm.

Agreed Procedures - Suspension and Termination

- DMA took group through content on Suspension and Termination.
- PH noted that normally Industry would have a good understanding of obligations before going through this for SS Code. Currently they are unsure of which obligations they will get and so are unsure if Suspension Agreed Procedure is fit for purpose. Adding that industry will need to see this. ND noted that ongoing Parameters and Scalars work will impact Suspension and Termination and regarding what will constitute a default. Adding that this is a placeholder and the SS Code may need to change based on outcome of the Parameters and Scalars consultation.

Agreed Procedures - Dispute Resolution

- DMA talked group through content on Dispute Resolution.
- BM queried that governing of costs is not mentioned in the slides. Adding the TSOs suggested in an earlier Working Group that the SS Code would be mimicking T&SC where costs would be split 50/50. Additionally, the 50/50 split may be a barrier to participants raising a dispute. BM believes Dispute Resolution Board should award costs as opposed to a party being in the right but paying half the costs, adding this is opportunity to correct this. BM also noting that there is no modifications committee as such in SS Code and when parties are in the right they can be out of a lot of money.
- CD agreed this was discussed previously in a Working Group and that the TSOs also discussed this with the RAs. It was agreed with RAs that the approach to the SS Code was to keep it in line with T&SC for now. However it was also agreed that this would be subject to consultation as part of the SS Code consultation scheduled to take place following legal drafting. CD highlighted the Working Group's contribution to the SS Code to date and development of the SS Code Comments Log to keep track of the group's contribution.
- PH reiterated BM point above and would welcome more information on why decision on costs was agreed with RAs.
- PH queried if accession to the SS Code is mandatory. CD noted it has not been finalised yet. PH added that voluntary termination notes agreement with RAs is needed and questioned why de-registration is 40 days and would like explanation of why it needs to be so long. CD responded that the SS Code could be viewed differently, and System Services need to be provided per the Grid Code.
- PH questioned why has the timeline for raising a dispute dropped from 2 years to 1 year in the SS Code? CD responded this change was made based on experience as it was rare something was 2 years. BOS added the TS&C is 2 years because there's more potential for this but for SS Code no disputes should be happening over a year and everything should be resolved quicker than TS&C. PH added further that DS3 settlement can sometimes be incorrect and can go back over quite a long time period. PH believes it would be prudent to keep at 2 years for first couple years of FASS, due to complexity and transition, but can reduce back to 1 year if required. CD added the TSOs will take this point away for consideration.
- PL added the procedure for Capacity Market qualification is good but spirit wasn't being adhered to. Based on their experience in the Capacity Market, more transparency around information required by participants as part of the qualification phase would have been beneficial. Noting the TSOs are at stage of requesting further information, if this can be obtained before entering a full dispute, the TSOs should encourage people to engage. PL questioned is there a way to force proper engagement at earliest stage so more disputes can be settled at the earliest stage? CD and DMA noting TSOs will take this point away and try to incorporate it.

Auction format of DASSA

- BR talked the group through this material.
- BM noted the consultations on products so far and asked if the TSO operational preferences has been consulted on. BR added this section of the SS Code is around forming bundles for the auction. One outcome of the consultations is there will be a section of the SS Code to describe it.
- BM asked if TSOs using implicit bundles has been agreed. JD responded this is in scope for upcoming consultation in Parameters and Scalars and there will be opportunity for industry feedback then.

AOB

- CD added hopefully industry find the comments log helpful.
- CD highlighted that System Services Supplier Charge decision will be issued shortly and TSOs aim to return to in person meetings once we have this decision.

Actions:

1. TSOs to provide Agreed Procedures presented in this session with tracked changes to the T&SC to the Working Group.
2. TSOs to consider timelines for raising a dispute and whether this should be within 1 year or 2 years of the Disputed Event.
3. TSOs to consider point raised by PL in relation to having transparency of all information requested as part of qualification process to avoid raising of disputes as described for the Capacity Market.
4. TSOs also agreed to confirm that Registration and Qualification timelines are in line with HLD.

TSO Response: Registration timelines originated from System Operator Guideline (2017/1485) that the TSOs complete the pre-qualification process for balancing capacity products (reserve services) within 90 days. The proposed timelines are also compliant with [SEM 22-012](#).