

SEM Committee

Principles of Dispatch and the Design of the Market Schedule in the Trading and Settlement Code

Decision Paper

Criteria for qualification of hybrid plant for priority dispatch in the SEM

SEM/13/006

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Executive Summary

Background

On 12 July 2012 the SEM Committee published its consultation (SEM-12-056) on the Criteria for qualification of hybrid plant for priority dispatch in the SEM.

Having regard to Article 16(2) of Directive 2009/28/EC the SEM Committee considers that priority dispatch should be afforded to qualifying hybrid plant to the extent that this is consistent with the spirit and intention of the Directive.

The Decision Paper on the Principles of Dispatch and the Design of the Market Schedule on the Trading and Settlement Code (SEM-11-062) sets out that the definition/application of 'hybrid' should not serve to result in generators using minimal amounts of renewable fuel to secure priority dispatch status and a perverse incentive in this regard. Rather the threshold for qualification for priority dispatch for hybrid plant should be set at a sufficiently high level such that parties genuinely committed to using renewable fuel sources in the context of Directive 2009/28/EC attract the benefit of priority dispatch.

In addition, the SEM Committee set out in its decision that the approach to qualification for priority dispatch for hybrid plant should take account of the environmental impacts of the operation of such plant. The SEM Committee decided to base a hybrid plant's entitlement to priority dispatch on the estimated impact of a given plant on emissions (CO₂) from power generation over a defined period.

The consultation paper provided a review of how this was to be implemented in accordance with SEM-11-062.

The consultation paper sought views on a number of topics:

- Definition of mid-merit reference thermal plant
- Carbon emissions for reference plant
- Eligibility for Priority dispatch - Timeline for the assessment of carbon emissions
- Eligibility for Priority dispatch - The methodology to be used for the assessment of an applicant hybrid plant.
- Eligibility for Priority dispatch - Temporary Hybrid Status

The SEM Committee received seven responses from interested parties on the Consultation Paper. These responses are summarised and addressed in the decision paper.

A number of respondents to SEM-12-056 raised issues related to decisions taken by the SEM Committee in SEM-11-062.

These topics are outside of the scope of the consultation paper, the focus of this consultation was to define the mid merit reference plant and associated assessment criteria.

Key Decisions Taken

Definition of mid-merit reference thermal plant

The SEM Committee is satisfied that the proposal on defining a mid-merit plant, as put forward in the consultation paper, should be derived from the directed contracts process. Therefore, for the purposes of defining a reference plant only, the SEM Committee is of the opinion that in assessing the mid-merit reference plant that reference plant should be based on a generation unit that runs between 728 – 5840 hours per year.

Carbon emissions for reference plant

The SEM Committee is still of the opinion that metered generation should be used for the purposes of defining a mid-merit reference plant, metered generation provides accurate data in relation to the energy sent out at the station gate as emissions also result from energy that is treated as losses in the system. In addition to this loss adjustments can change over time and to account for these losses would detract from fixing the methodology for a number of years.

The SEM Committee has decided that the carbon emissions should be based on the average of the carbon emissions from generating units that could have been categorised as mid-merit in 2011. The CO₂ emissions for the mid merit reference plant shall be set at **0.7445 tonnes/MWh**.

The SEM Committee has decided that the reference plant should remain fixed for a number of years, taking into consideration potential changes to the SEM this will remain the reference plant until the end of 2016.

An assessment of the potential impact on this decision will be evaluated in the event of changes to the SEM made as a result of the EU target Electricity Model, at which point the SEM Committee will evaluate the need to change the reference plant based on the criteria set out in the decision paper and taking into consideration changes in the market.

Eligibility for Priority dispatch: Timeline for the assessment of carbon emissions

The consultation paper set out the proposed timelines to be adhered to for the assessment of carbon emissions. The SEM Committee has decided that these timelines shall apply and expects all relevant units seeking hybrid status shall comply with these requirements.

Eligibility for Priority dispatch: The methodology to be used for the assessment of an applicant hybrid plant.

The SEM Committee is of the opinion that the assessment methodology as set out in the previous decision paper is appropriate, and therefore sees no need to change the assessment methodology.

Eligibility for Priority dispatch: Temporary Hybrid Status

The Consultation paper set out the SEM Committee's proposals for the assessment of plants wishing to avail of temporary hybrid status if it were to be adopted.

The SEM Committee has decided that temporary hybrid status may be applied subject to adherence to assessment criteria set out in this paper. This includes a 90 day notification period and monthly submissions from those plants with respect to their carbon emissions and priority dispatch status for the relevant temporary period.

1 Background

- 1.1 On 12 July 2012 the SEM Committee published its consultation (SEM-12-056) (“the Consultation Paper”) on the Criteria for qualification of hybrid plant for priority dispatch in the SEM.
- 1.2 Having regard to Article 16(2) of Directive 2009/28/EC the SEM Committee considers that priority dispatch should be afforded to qualifying hybrid plant to the extent that this is consistent with the spirit and intention of the Directive.
- 1.3 The Decision Paper on the Principles of Dispatch and the Design of the Market Schedule on the Trading and Settlement Code (SEM-11-062) (“the **Decision Paper**”) sets out that the definition/application of ‘hybrid’ should not serve to result in generators using minimal amounts of renewable fuel to secure priority dispatch status and a perverse incentive in this regard. Rather the threshold for qualification for priority dispatch for hybrid plant should be set a sufficiently high level such that parties genuinely committed to using renewable fuel sources in the context of Directive 2009/28/EC attract the benefit of priority dispatch.
- 1.4 In addition, the SEM Committee set out in its decision that the approach to qualification for priority dispatch for hybrid plant should take account of the environmental impacts of the operation of such plant. The SEM Committee decided to base a hybrid plant’s entitlement to priority dispatch on the estimated impact of a given plant on emissions (CO₂) from power generation over a defined period.
- 1.5 The Decision Paper set out how this was to be implemented:
- A hybrid plant will be considered eligible for priority dispatch when it can be shown to emit fewer carbon emissions (tCO₂/MWh) than an appropriate reference thermal plant deemed to be displaced by the qualifying hybrid plant. The SEM Committee considers that a mid merit plant operating in the SEM is the appropriate reference plant in this context.
 - The actual carbon emissions for the reference plant are available through work already carried out by the RAs on an annual basis. The ex-post, actual carbon emissions information available for the reference plant must be for the most recent full twelve months of operation for which the RAs have all appropriate information.

- The timeline for the assessment will be driven in principle by the timeline for the publication of audited emissions (CO₂ in t/MWh) figures regarding the power generation sector by the Environmental Protection Agency (EPA) in Ireland and by the Department of the Environment (DoE) in Northern Ireland. On that basis, the assessment will take place in the second quarter of each year.
- For the first assessment for an applicant hybrid plant, an assessment using estimated information can be carried out. Parties with no past information can qualify for priority dispatch for the next defined period based on a modelled estimate of their running for the subsequent period coupled with estimates of the associated average carbon emissions associated with that modelled running. The model used to calculate estimates of Dispatch Balance Costs (DBC) by EirGrid will be employed to model estimated running by relevant plant for the period in question. For this modelling exercise average emission figures for existing hybrid plant will be based on available verified figures from the EPA and the DoE. Where such verified figures are not available, the applicant plant shall provide its best estimate of carbon emissions setting out the basis and rationale for this estimate.
- Parties that have past information for less than one defined period can qualify on the basis of a combination of actual information and estimates.
- For subsequent assessments actual operational information for the relevant twelve month period will be used.
- Carbon emissions arising from the renewable fuel inputs to such plant will be deemed to be equal to zero. This is considered appropriate given the treatment of CO₂ emissions from biomass by the EU.
- Where parties are shown, on the basis of audited ex-post information submitted to the RAs for review not to have reached the qualifying threshold for a defined period they forego qualification for priority dispatch for the next defined period.
- In addition to the above, the SEM Committee is of the view that a reasonable 'de-minimis' threshold of 10% renewable electricity should be produced from the hybrid plant for the defined period in which it wishes to avail of priority dispatch in order to ensure a minimum contribution of renewable electricity from the hybrid plant. This also ensures minimum contribution to RES-E targets is being made by such plant.

1.6 The consultation paper sought views on a number of topics:

- 1.7 Definition of mid-merit reference thermal plant
- 1.8 Carbon emissions for reference plant
- 1.9 Eligibility for Priority dispatch - Timeline for the assessment of carbon emissions
- 1.10 Eligibility for Priority dispatch - The methodology to be used for the assessment of an applicant hybrid plant.
- 1.11 Eligibility for Priority dispatch - Temporary Hybrid Status

2 Responses to consultation

- 2.1 The SEM Committee received seven responses from interested parties on the Consultation Paper.
- 2.2 The respondents were:
 - Arc21
 - Aughinish Alumina Ltd
 - Bord na Mona
 - Dublin Waste to Energy Limited
 - Eirgrid
 - Indaver Ireland ltd
 - Power NI Energy Ltd - Power Procurement Business (PPB)
- 2.3 A summary of the key topics discussed in the consultation paper is provided below, along with a summary of responses received on the specific questions.

3 Non-specific comments received

- 3.1 A number of respondents to SEM-12-056 raised issues related to decisions taken by the SEM Committee in SEM1-062. For example:
- One respondent strongly disagreed with using an emissions test and argues that this is inappropriate on a number of grounds, including, it is argued the potential for unintended and discriminatory consequences.
 - Another respondent discussed the 10% de minimis threshold regarding electricity from renewable sources and states a preference for a 15% figure here.
 - Other responses received disagreed with the 'reference' plant approach/method.
- 3.2 These topics are outside of the scope of the consultation (SEM-12-056), the focus of this consultation was to define the mid merit reference plant and associated assessment criteria.
- 3.3 An additional comment was received from Eirgrid seeking clarification that *“any reference to “plant or Unit” in the Consultation Paper complies with the definition of “Generation Unit” in the Ireland Grid Code and “Generating Unit” in the Northern Ireland Grid code as appropriate”*
- 3.4 The SEM Committee would like to clarify that this was the intention and that a hybrid plant or hybrid generating unit that qualifies for priority dispatch should be a single dispatchable Generation Unit/Generating Unit that in its entirety qualifies for priority dispatch
- 3.5 There is no proposal to assign partial priority dispatch to a single unit.

4 Definition of mid-merit reference thermal plant

4.1 In the Consultation Paper the SEM Committee set out that for the purposes of defining a reference plant only, the SEM Committee is of the opinion that a mid-merit plant should be derived from the work carried out in the directed contracts process.

4.2 The SEM committee also set out that it believed that the reference plant should be based on metered generation as this directly relates to actual carbon output.

4.3 **Question 1: Does the respondent agree with the proposals put forward for defining a mid merit plant for the purposes of the reference thermal plant deemed to be displaced by the qualifying hybrid plant?**

- Aughinish Alumina Ltd and PPB disagreed in general the principle of using a mid-merit plant as the reference plant, as this may not reflect the plant actually being displaced
- PPB presented the view that output rather than operational hours should be considered to define the reference plant
- Arc21 asked for clarification that the range of hours that is considered 'mid merit' not change from year to year, albeit that different plant may move in and out of that range over time.
- No other participant objected to the proposed approach for defining a mid merit plant, however a number of participants requested greater transparency
- PPB also pointed out that the operational hours for a mid merit product under directed contracts is in fact 728 to 5840 Hours

4.4 **SEM Committee Decision:**

- The SEM Committee is satisfied that the proposal on defining a mid-merit plant, as put forward in the consultation paper, should be derived from the directed contracts process. Therefore, for the purposes of defining a reference plant only, the SEM Committee has decided that in assessing the mid-merit reference plant that reference plant should be based on a generation unit that runs between 728 – 5840 hours per year.
- In response to the query regarding the potential for the range of hours being able to change from year to year it is intended that this will apply for a number of years and is covered under section 5 of this decision paper.

5 Carbon emissions for reference plant

- 5.1 In the Consultation Paper the SEM Committee set out that the proposed assessment for the reference plant would be based on metered generation for the calendar year 2011.
- 5.2 It is the stated view of the SEM Committee that the approach to qualification for priority dispatch for hybrid plant should take account of the environmental impact, and that such plant should impact positively on greenhouse gas emissions.
- 5.3 The SEM Committee also proposed two options for defining the reference thermal plant that would be displaced by a hybrid plant availing of Priority Dispatch:
- Option 1: In order to meet the aim of reducing emissions the most polluting mid-merit plant (as defined under the guidelines in section 3) should be used in deciding the appropriate reference plant deemed to be displaced by the qualifying hybrid plant. The SEM Committee are considering this option as a proxy for the plant deemed to be displaced in dispatch for the purposes of Carbon Emissions
 - Option 2: The average carbon emissions from all plants defined as mid-merit for 2011 should be used. This would contribute to the carbon reduction aim stated in the Decision Paper and takes into account the carbon efficiency of all the units that are categorised as mid-merit plants.
- 5.4 The SEM Committee proposed retaining the reference plant and emissions factor for 3 years, with an option to extend this period.
- 5.5 **Question 2: Does the respondent agree with the proposals put forward for evaluating the carbon emissions based on metered generation?**
- Aughinish Alumina Ltd proposed using Market Scheduled Quantity (MSQ) rather than Metered Generation (MG), given that the principle of least cost dispatch is based on MSQ rather than MG.
 - PPB did not agree with the proposal to evaluate emissions based on metered generation.
 - Indaver raised no objections to the proposal
 - The remaining responses proposed a loss adjusted metered generation should be used to reflect the generation that is available for consumption.

5.6 **SEM Committee Decision:**

- The SEM Committee has decided that metered generation should be used; metered generation provides accurate data in relation to the energy sent out at the station gate as emissions also result from energy that is treated as losses in the system. In addition to this loss adjustments can change over time and to account for these losses would detract from fixing the methodology for a number of years.

5.7 **Question 3: Does the respondent agree with the proposal to use the most polluting plant that falls under the definition of mid merit as set out in section 3 (of the consultation document)?**

- Aughinish Alumina proposed using option 2 (the average carbon emission of all the reference thermal plants) would be appropriate. Stating that increased emissions might result if Option 1 (the most polluting plant) were taken as the plant being displaced.
- PPB did not agree with using the most polluting plant as the reference plant stating that “to satisfy the criterion that overall emissions must reduce, the assessment must reflect the actual mix of generation that is displaced as a consequence of conferring priority status to the particular Hybrid plant”
- All other respondents agreed with option 1 i.e. the proposal to use the most polluting plant as the reference plant

5.8 **SEM Committee Decision**

- Having considered all of the responses the SEM Committee believes that basing the emissions of a mid-merit reference plant on a single generating unit may not fully account for changes in the merit order
- The SEM Committee has also proposed that the reference plant should be retained for 3 years with an option of extending this, therefore the most polluting mid-merit reference plant is not be appropriate for this period.
- Therefore, the SEM Committee has decided that the carbon emissions should be based on the average of the carbon emissions from generating units that could have been categorised as mid-merit in 2011.
- The CO₂ emissions for the mid merit reference plant shall be set at **0.7445 tonnes/MWh**

5.9 **Question 4: Does the respondent agree with the proposal to retain the reference plant for a number of years?**

- PPB disagreed with the proposal indicating that “the generator displacement will vary as new generation commissions, the network topology changes, and as commodity prices vary, changing the generation mix.” With a concern that this approach could result in higher emissions.
- All other respondents agreed with the proposal to retain the reference plant for an initial period of three years.
- Aughinish Alumina indicated that the fixed period should be subject to any changes made to the SEM for the EU Target Electricity Model.
- Dublin Waste to Energy and Arc 21 provided a preference for the reference plant for a longer period than three years to provide investor certainty.

5.10 **SEMC Decision**

- The SEM Committee has previously stated that the approach to qualification for priority dispatch for hybrid plant should take account of the environmental impact, and that such plant should impact positively on greenhouse gas emissions. The aim of providing a reference plant should take this into account. However, the SEM Committee would also like to provide a degree of certainty to market participants.
- The SEM Committee has decided that the reference plant should remain fixed for a number of years, taking into consideration potential changes to the SEM this will remain the reference plant until the end of 2016.
- An assessment of the potential impact on this decision will be evaluated in the event of changes to the SEM made as a result of the EU target Electricity Model. At which point the SEM Committee will evaluate the need to change the reference plant based on the criteria set out in the decision paper and taking into consideration changes in the market.

6 Eligibility for Priority dispatch: Timeline for the assessment of carbon emissions

- 6.1 In the Consultation paper the SEM Committee was satisfied that the criteria set out in the previous decision paper was achievable and therefore did not propose any changes to that decision:

- The timeline for the assessment will be driven in principle by the timeline for the publication of audited emissions (CO₂ in t/MWh) figures regarding the power generation sector by the Environmental Protection Agency (EPA) in Ireland and by the Department of the Environment (DoE) in Northern Ireland. On that basis, the assessment will take place in the second quarter of each year.

6.2 **Question 5: The SEM Committee are seeking views on the proposal set out above.**

- Arc 21, Dublin Waste to Energy and Indaver highlighted that WtE plant are not required to submit annual emissions data to EPA or DoE (where applicable). For this reason no objection was raised.
- No objections were raised to this approach.

6.3 **SEM Committee Decision**

- Whilst the combustion of fuels in installations for the incineration of hazardous or municipal waste is not an “activity” under Directive 2003/87/EC it is noted that emissions associated with the burning of non renewable energy sources in such installations are counted when reporting under the Kyoto Protocol. It is in this context that countries are assessed relative to binding greenhouse gas targets. Therefore, the SEM Committee is of the view that to exclude emissions from WtE plants relating to non renewable fuel sources would not be consistent with assessment of greenhouse gases as above. Indeed, the Committee understand that the reason that WtE installations were not included in the emissions trading scheme was ‘due to complexities of measuring the carbon content of the waste material that is being burnt’ as opposed to as a matter of principle.
- The SEM Committee considers that an appropriate degree of consistency with the assessment of greenhouse gas emissions under the Kyoto Protocol would be achieved where CO₂ emissions from the non renewable portion of fuel burnt in a WtE plant are reflected when assessing applications for such plant for qualification for priority dispatch in the SEM.

- The SEM Committee notes that reports under Kyoto also reflect emissions from landfills in reporting on the waste sector. In that context, the SEM Committee considers that it is appropriate that the extent to which WtE plants result in avoided emissions (CO₂ equivalent) from landfills is reflected in emissions figures submitted to the SEM Committee by WtE plants applying for priority dispatch in the SEM.
- The SEM Committee therefore expects all units seeking hybrid status to comply with the timelines set out above.

7 Eligibility for Priority dispatch: The methodology to be used for the assessment of an applicant hybrid plant.

7.1 The SEM Committee did not propose any changes to the previous decision on the methodology for assessment of the hybrid plant:

- For the first assessment for an applicant hybrid plant, an assessment using estimated information can be carried out. Parties with no past information can qualify for priority dispatch for the next defined period based on a modelled estimate of their running for the subsequent period coupled with estimates of the associated average carbon emissions associated with that modelled running. The model used to calculate estimates of Dispatch Balance Costs (DBC) by EirGrid will be employed to model estimated running by relevant plant for the period in question. For this modelling exercise average emission figures for existing hybrid plant will be based on available verified figures from the EPA and the DoE. Where such verified figures are not available, the applicant plant shall provide its best estimate of carbon emissions setting out the basis and rationale for this estimate.
- Parties that have past information for less than one defined period can qualify on the basis of a combination of actual information and estimates.
- For subsequent assessments actual operational information for the relevant twelve month period will be used.

7.2 In the consultation paper the SEM Committee stated that: “where it can be proved that false, misleading or incorrect information has been submitted to gain Priority Dispatch Status the company responsible should be prevented from applying for Priority Dispatch as a hybrid plant for a minimum of five years.”

7.3 In addition to this the SEM Committee considered that false, misleading or incorrect information provided to the regulators could be deemed to be a breach of licence by the appropriate Regulatory Authority.

7.4 **Question 5: The SEM Committee are seeking views on the assessment criteria set out above.**

- Two respondents (Arc 21 and Dublin Waste to Energy) have stated:
“that where false, misleading or incorrect information is submitted to obtain priority dispatch, the company responsible shall be prevented from applying for priority dispatch for five years. We note that this penalty is severe and may be considered disproportionate in particular in respect of the submission of incorrect information. At a minimum, this penalty must be limited to deliberate and fraudulent misrepresentations only. Beyond this we would query the vires of the SEM Committee in imposing such a penalty, in particular where the effect of this is to deny a right conferred by a mandatory directive requirement.”
- In addition to this two respondents (Arc 21 and Dublin Waste to Energy) have queried whether either regulator has the vires to “deem” a licence breach in respect of something that is not a breach of a specific licence condition, and have requested clarification on this issue.
- PPB was of the opinion that hybrid status *“should only be conferred where modelling of dispatch and the resulting overall emissions for the plant with and without priority status demonstrates that granting priority status will contribute to lower carbon emissions”*.
- Aughinish Alumina would like to have seen the assessment criteria including a confirmation of the security of the renewables supply source and its sustainability. In addition to this they would like to see the misleading criteria including a provision to prevent an application for Priority Dispatch as a renewable plant from the company responsible.

7.5 **SEM Committee Decision**

- The SEM Committee is of the opinion that the provision of false, misleading or incorrect information will be dealt with as appropriate under the existing regulatory arrangements.

- Taking into consideration all of the proposals put forward the SEM Committee is of the opinion that the assessment methodology as set out in the previous decision paper (SEM-11-062) is appropriate, and therefore sees no need to change the assessment methodology.

8 Eligibility for Priority dispatch: Temporary Hybrid Status

- 8.1 The Consultation paper set out the SEM Committee's proposals for the assessment of plants wishing to avail of temporary hybrid status if it were to be adopted.
- 8.2 Where temporary hybrid status is requested, the SEM Committee proposed that an application to the SEM Committee must be made at least 90 days in advance of when the temporary period is due to begin, and notice must also be provided by the generator to SEMO. No subsequent applications will be considered within this 90 day period.
- 8.3 The SEM Committee considered that applying a full 12 month assessment to such a plant could disqualify a plant from seeking priority dispatch, and set out proposed changes to the assessment methodology to allow for this eventuality.
- 8.4 The SEM Committee proposed that the plant availing of temporary hybrid status should be subjected to the same assessment criteria as all other hybrid plant as set out in section 6 of the consultation paper, except that the assessment would be based only on the period that temporary hybrid status had been applied for.
- 8.5 The SEM Committee put forward an option that would require those wishing to avail of hybrid status to provide data for the full year in line with all other hybrid plant. However, those seeking temporary hybrid status would be required to submit the following data:
- Metered generation for the plant for the full year.
 - Carbon emissions for full year.
 - Total fuel from renewable sources used over year.
 - Periods for which temporary status was requested.
 - Metered Generation, Actual emissions data and fuel data must be submitted for the period(s) during which the generator operated under priority dispatch (as a hybrid plant).

- 8.6 The SEM Committee also proposed that those wishing to avail of priority dispatch on a temporary basis should provide independently verified carbon emissions data on a monthly basis, for the whole year.
- 8.7 Failure to supply any relevant information with timeframe could affect their eligibility for hybrid status in the future.
- 8.8 The consultation paper proposed that temporary hybrid status would be subject to Regulatory approval and would require all of the above information to make an informed decision.

8.9 **Question 6: Does the respondent agree with the proposal for allow plant wishing to avail of temporary hybrid status?**

- PPB was of the opinion that a single consistent approach should be adopted for all. PPB suggested an approach involving providing windows within a year for plants to hold Hybrid status.
- Aughinish Alumina disagreed with the proposal stating that “Adopting this approach would only lead to complex arrangements and could provide the opportunity for hybrid plants to switch status for commercial objectives.”
- Both Arc 21 and Dublin Waste to Energy provided no comment on this question.
- Bord Na Mona and Indaver supported the proposals for temporary status.

8.10 **SEM Committee Decision**

- The SEM Committee acknowledges the concerns of Aughinish Alumina and considers the strict assessment criteria set out in the consultation paper should alleviate these concerns.
- The SEM Committee also considers the proposal to include windows within the year, at this stage, may deter some units from declaring themselves as priority dispatch, and in doing so may limit the potentially positive impact these units could provide in reducing carbon emissions.
- The SEM Committee has decided that temporary hybrid status may be applied subject to the decision on the assessment criteria set out below.

8.11 **Question 7: The SEM Committee are seeking views on the assessment criteria set out above, or any other assessment criteria that could be adopted in such circumstances?**

- PPB has raised objections to the “reference” plant methodology.
- Bord na Mona would like the SEM Committee to reconsider the 90-day minimum application period and the provision of verified carbon emissions data on a monthly basis.
- No additional comments have been received in relation to this proposed assessment criteria.

8.12 **SEM Committee Decision**

- The SEM Committee proposal for the 90 day minimum application period was set out to allow the SEM Committee sufficient time to assess each proposal before awarding temporary hybrid status, this 90 day application process would include 61 days for the SEM Committee to carry out its assessment and approval, which would allow the applicant the necessary 29 days notice to the Market Operator. It is the view of the SEM Committee that any application for temporary status would include the time frame for which temporary hybrid status is being applied for (including both start and end date)
- The SEM Committee is not convinced that the 90-day notice criteria should be amended, as the proposal to allow temporary hybrid status is based upon SEM Committee approval.
- Bord na Mona have presented an argument that the provision of verified data on a monthly basis may not always parallel the period of operation as a hybrid plant, and that the provision of metered generation, actual emissions data and fuel data for the period during which the unit operated under priority dispatch as a hybrid plant is of much more relevance. The SEM Committee agrees that this information would be relevant and therefore would require that the all hybrid plant must submit a break-down of all this information for the period that they have been granted temporary status.