

APPENDIX A RESPONSE TEMPLATE

SUMMARY INFORMATION

Respondent's Name	ESB Networks
Type of Stakeholder	DSO, MDP
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I-SEM TSC COMMENTS

ID	I-SEM TSC Reference	Short Title	Commentary / Explanation	Suggested Drafting Change to the TSC	Relevant Cross-Reference for any impacted section
1		Trading Day/Settlement Day Registration Events New Unit Registration And	ESB Networks perceives a conflict between obligation of MDP to provide data on a Settlement Day basis v the requirement of a Participant to commence trading & submit data from the start of the effective date. This in turn leads to a lack of clarity on exact requirements of MDPs, and for the avoidance of doubt this extends to all Unit types for which MRSO is a MDP and not purely Generator Units which are the subject of these specific T&SC sections.	Note : This has been discussed in the Metering Working Group. ESB Networks requests clarity , and , the provision of enduring documentation similar to that which was provided for the SEM. To that end, ESB Networks has provided evidence of this	There isn't any : ESB Networks is requesting that enduring, separate (new) documentation would be provided, similar to that which was provided for the SEM, for Registration events and the treatment of

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	<p>(a) T&SC</p> <p>B.7.6.12</p> <p>B.7.6.13</p> <p>B.7.6.15</p> <p>B.7.6.16</p> <p>B.7.6.17</p> <p>Comment – it is possible that there are further sections that are relevant to this argument but have not been identified in this submission</p>	Deregistration of a Unit	<p>References</p> <p>(a) T&SC</p> <p>B.7.6.12 Where the Party (or Applicant, as applicable) concerned:</p> <p>(a) has supplied all information required and satisfied all such conditions as notified to the Party (or Applicant, as applicable) pursuant to paragraph B.7.6.5;</p> <p>(b) has paid the Participation Fees; and</p> <p>(c) is not otherwise in breach of the Code or the Framework Agreement,</p> <p>then the Market Operator shall issue a Commencement Notice to the Participant and a copy to each System Operator and relevant External Data Provider as soon as reasonably practicable and at least 4 Working Days prior to the Unit’s Effective Date. The Commencement Notice shall specify the Effective Date, being the Trading Day from the start of which, registration of the Units concerned shall be effective, provided that the Required Credit Cover has been posted and that any applicable Account Security Requirements (including, for the avoidance of doubt, the Deed of Charge and Account Security) have been put in place 10 Working Days prior to the Effective Date.</p> <p>B.7.6.13 For each Generator Unit where a Meter Data Export Date has been determined in accordance with paragraph B.7.6.10, the Market Operator shall set the Effective Date for a Generator Unit to the Meter Data Export Date, or to the nearest possible date after the Meter Data Export Date, subject to the agreement of the Party (or Applicant as applicable), the relevant System Operator and Meter Data Provider, and shall issue a Notice of Effective Date to the relevant Party (or</p>	<p>documentation from the time of the SEM to the Metering Working Group, for consideration.</p> <p>And, for the avoidance of doubt, this comment extends to all Unit types for which MRSO is a MDP and not purely Generator Units which are the subject of these specific T&SC sections.</p> <p>The Understanding of ESB Networks and for which it is looking for documented confirmation is that Data Provision arrangements for New Unit registration and Deregistration events similar to those for the SEM are required of ESB Networks for the I-SEM with the key difference that there needs to be an amendment to them to accommodate the change in the Trading Day for the I-SEM to 23:00-23:00 instead of 06:00-06:00 for the SEM.</p>	Metering Data to handle the Trading Day/Settlement day contentions.

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	<p>(b) Agreed Procedure 1</p> <p>Section 2.2</p> <p>Appendix 3</p>		<p>Applicant).</p> <p>B.7.6.15 Units shall be deemed registered for the purposes of participation under this Code from the start of the Effective Date.</p> <p>B.7.6.16 A Participant shall commence trading in respect of a Unit at the start of the relevant Effective Date. For that purpose, a Party (or Applicant, as applicable) shall, following submission of its Participation Notice and prior to the Effective Date, submit such data in respect of trading for the Effective Date and any subsequent date as may be required in accordance with the Code.</p> <p>(b) Agreed Procedure 1</p> <p>2.2. Unit Registration</p> <p>....The Units registered to the Participant will be eligible for trading from the start of a Trading Day which corresponds with the relevant Effective Date...</p> <p>Appendix 3: REGISTRATION INFORMATION COMMUNICATED TO METER DATA PROVIDER PARTIES BY THE MARKET OPERATOR</p> <p>OVERVIEW</p> <p>5. Effective Date – This represents the Trading Day that the Unit will go live in the Market. This is the first date that the MDP must submit Meter Data on behalf of the registered Unit. In the case of a deregistration, the effective date represents the first Trading Day that</p>	<p>By way of further information:</p> <p>(a) For the SEM, Zero values for Metered Quantity are submitted by ESB Networks on the day before the first full Settlement day for a new Unit; likewise Zero values for Metered Quantity are submitted by ESB Networks on the day after the last full Settlement day for a Deregistering Unit</p> <p>(b) on the day before the first full Settlement day for a new Unit, ESB Networks is required to only submit Settlement Interval Periods from 06:00 to 24:00, and on the day after the last full Settlement day for a Deregistering Unit, ESB Networks is required to only submit Settlement Interval Periods from 00:00 to 06:00</p>	

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	(c) Agreed Procedure 16		<p>the MDP must stop submitting Meter Data on behalf of the Deregistering Unit. For the registration of a new Generator Unit the Meter Data Provider will complete the Meter Data validation, as set out in steps 4.7 to 4.9 of section 3.2.4.</p> <p>(c) Agreed Procedure 16</p> <p>2.1 Business Requirements for Meter Data</p> <p>Meter Data Providers are required to send Meter Data of all Generator Units, the Net-Inter-Jurisdictional Import, the Interconnector Metered Data, and Meter Data of all Supplier Units (always grouped by Settlement Day, midnight to midnight), as applicable, to facilitate the following time critical business processes:</p>		
2	T&SC c.4 (all)	Contingency Data Submission for Meter Data Provider	<p>References</p> <p>T&SC</p> <p>C.4 CMS DATA TRANSACTION AND MARKET PROCEDURES</p> <p>C.4.1 System Operator Market Data Transactions, Interconnector, Administrator Market Data Transactions and Meter Data Transactions</p> <p>C.4.1.1 The Market Operator shall not estimate or substitute System Operator Market Data Transactions, Interconnector Administrator Market Data Transactions or Meter Data Transactions except as required when Administered Imbalance Settlement is in effect.</p> <p>C.4.1.2 If for a particular Imbalance Settlement Period, in relation to</p>	<p>Note : This has been discussed in the Metering Working Group.</p> <p>Could a Contingency be considered and agreed for example where a Meter Data Provider cannot produce the normal file at D+1 or D+4 then ESB Networks would send a file via email with historical data from a similar Settlement day in the past, with dates amended</p>	

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			<p>any one of the CMS Data Transactions listed in Appendix K “Other Market Data Transactions” or Appendix L “Meter Data Transactions” either:</p> <p>(a) no such CMS Data Transaction has been received by the Market Operator before the applicable deadline; or</p> <p>(b) none of the CMS Data Transactions received prior to the applicable deadline meets the requirements to be Validated by the Market Operator,</p> <p>then, all calculation and processing in relation to Settlement by the Market Operator and to which the relevant data relates shall be deferred until the valid data is provided to and accepted by the Market Operator, unless Administered Imbalance Settlement is in effect.</p> <p>C.4.1.3 When processing is deferred in accordance with paragraph C.4.1.2, the obligations of the Market Operator in respect of any consequential Data Transactions and publication shall also be deferred accordingly.</p> <p>C.4.1.4 Notwithstanding paragraphs</p> <p>C.4.1.2 and C.4.1.3, the Market Operator shall use Prudent Electric Utility Practice to continue</p>	<p>eg.</p> <p>Although it has never been used, this is the current contingency arrangement which was agreed with the IGG and SEM-O at the start of the SEM:</p> <ul style="list-style-type: none"> • For Initial Aggregation, the contingency is that the Indicative D+1 Aggregation data that was produced in advance of the D+4 Aggregation would be sent to SEM-O for use in Initial Aggregation. This would be sent by email. • For Indicative Aggregation, the contingency is that the Initial D+4 Aggregation data that was produced for the same day of the previous week would be sent to SEM-O for use in Indicative Aggregation. This 	

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				<p>would be sent by email.</p> <ul style="list-style-type: none"> Note: Normal Retail Market Messages from Data Aggregation would not issue to Suppliers as part of this contingency and this was flagged to Suppliers at the time of the SEM. It would be prudent to remind Suppliers of this should this contingency be agreed for the I-SEM. <p>It is further proposed that the contingency agreement would include, but not be limited to a scenario where the reason for Administered Settlement impacts on a Meter Data Provider's ability to provide Metered Quantities to Settlement.</p> <p>Contingency arrangements are detailed in Appendix K however</p>	

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				<p>this does not include Meter Data Provider submissions.</p> <p>For Information: The following is the response to a query raised by ESB Networks to the MRWG which indicates there is potentially a workable solution to this item however it possibly needs more details to be fleshed out in the Metering WG and/or TLG? (see xls entry #451) :</p> <p>.... The drafting of the T&SC will take into account any relevant decision that would come from the Metering Forum discussions. Contingency data is not limited to administered settlement and should be looked at for each Data Transactions. Currently contingency arrangements are detailed in Appendix K. The format of the submission is expected to be the same as a regular submission and should not have any impact on the rules. The technical delivery of files in exceptional circumstances will be discussed at TLG meetings while the rules around contingency data are deferred to the section on Appendices and Agreed Procedures which is due for discussion at WG9.</p> <p>Deferred to WG9 28/07/2016</p>	

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	Agreed Procedure 11, Appendix 2		<p>REFERENCES:</p> <p>Agreed Procedure 11</p> <p>APPENDIX 2: POTENTIAL FAILURES AND TYPICAL CORRECTIVE ACTIONS</p> <p>Note: this appendix to be updated once further details become available</p> <table border="1" data-bbox="741 1034 1451 1246"> <thead> <tr> <th data-bbox="741 1034 1025 1058">Failure</th> <th data-bbox="1025 1034 1310 1058">Action</th> <th data-bbox="1310 1034 1451 1058">Maximum Duration</th> </tr> </thead> <tbody> <tr> <td data-bbox="741 1074 1025 1201">Meter Data Providers/Interconnector Administrators are able to produce the meter data but unable to send it through a Communication Channel</td> <td data-bbox="1025 1074 1310 1201">Market Operator and each affected Meter Data Provider/Interconnector Administrator will agree an alternative secure method for transferring the data for each type of Data Transaction</td> <td data-bbox="1310 1074 1451 1201">5 Working Days</td> </tr> </tbody> </table>	Failure	Action	Maximum Duration	Meter Data Providers/Interconnector Administrators are able to produce the meter data but unable to send it through a Communication Channel	Market Operator and each affected Meter Data Provider/Interconnector Administrator will agree an alternative secure method for transferring the data for each type of Data Transaction	5 Working Days	<p><i>Update on 08/11/2016: Appendix K was circulated in advance of WG11 6th October 2016. There are no specific contingency requirements for MG however the Metering Forum may make provisions for contingency plans</i></p> <p>ESB Networks proposes that the text in Appendix 2 of Agreed Procedure 11 could also be considered when considering contingency.</p>	
Failure	Action	Maximum Duration									
Meter Data Providers/Interconnector Administrators are able to produce the meter data but unable to send it through a Communication Channel	Market Operator and each affected Meter Data Provider/Interconnector Administrator will agree an alternative secure method for transferring the data for each type of Data Transaction	5 Working Days									
3	Agreed Procedure 16	Enduring Documentation for the File Format for MDP File	<p>REFERENCES:</p> <p>Agreed Procedure 16</p>	<p>Note : This has been discussed in the Metering Working Group.</p> <p>(a) ESB Networks requests that enduring</p>							

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		Submissions	<p>2.3 Grouping Individual Data Records into Data Transactions</p> <p>...An overview of the format of the file that shall be sent to the Market Operator by a Meter Data Provider is detailed at Appendix 2 "File Format Overview".</p> <p>APPENDIX 2: FILE FORMAT OVERVIEW</p> <p>This Appendix provides an overview of some rules regarding the file format to be used in exchanging data between the Meter Data Providers and the SEM systems.</p> <p>GENERAL DESCRIPTION OF THE SEM-MDP MESSAGE FORMAT</p> <p>The message format includes the following types of data:</p> <ul style="list-style-type: none"> (a) Header details, containing the username and password and other security details from the digital certificate; (b) Unit level information, including the Unit name; (c) Time period Meter Data at a half-hourly resolution; (d) Non Interval Energy Proportion data at a half-hourly resolution; and (e) Trailer details, including a checksum to verify the integrity of the file. <p>The following principles apply to the file format:</p> <ul style="list-style-type: none"> (a) The message is formatted via XML; (b) Full stop is used in fractional numbers, e.g. 12.34 or 0.34; (c) Negative numbers should be prefixed by a minus sign, e.g. -12.34 or -0.34; 	<p>documentation would be provided and that it would be to a level of detail similar to that in the transient document 'Integrated Single Electricity Market (I-SEM) I-SEM MI MMS MDP Interfaces Functional Description that is available on the SEM-O website.</p> <p>(b) Also, as requested in response ID#1 above, ESB Networks requests that enduring , separate documentation would be provided similar to that which was provided for the SEM for Registration events for the treatment of Metering Data provision, to handle Trading Day/Settlement Day contentions.</p>	

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			<p>(d) Numbers (for Meter Data) should be expressed to a maximum of three decimal places; and</p> <p>(e) Meter Data for energy entering the Transmission System (i.e. generation) should be positive (there is no requirement for a “+” sign), and Meter Data for energy exiting the Transmission System (i.e. demand) should be signed negative (there is a requirement for “-” sign). Zero values are not signed positive or negative. Please note that this is a file-transfer convention only. Demand variables in the Code algebra, for example, Metered Demand MDvh are positive for the purposes of the Code algebra.</p>										
4	<p>Agreed Procedure 16</p> <p>Abbreviations</p> <p>NPED</p> <p>NPEG</p> <p>PED</p> <p>PEG</p>	<p>The description introduces a potential for misunderstanding of the enduring nature for MDP Data Submissions using Data Transaction Identifiers NPED,NPEG</p>	<p>Abbreviations(from AP16)</p> <table border="1" data-bbox="748 826 1449 1201"> <tr> <td data-bbox="748 826 853 922">NPED</td> <td data-bbox="853 826 1449 922">Legacy Identifier indicating Non-Price Effecting Demand; valid only for data submitted pre-Cutover Time.</td> </tr> <tr> <td data-bbox="748 922 853 1018">NPEG</td> <td data-bbox="853 922 1449 1018">Legacy Identifier indicating Non-Price Effecting Generation; valid only for data submitted pre-Cutover Time.</td> </tr> <tr> <td data-bbox="748 1018 853 1114">PED</td> <td data-bbox="853 1018 1449 1114">Legacy Identifier indicating Price Effecting Demand; valid only for data submitted pre-Cutover Time.</td> </tr> <tr> <td data-bbox="748 1114 853 1201">PEG</td> <td data-bbox="853 1114 1449 1201">Legacy Identifier indicating Price Effecting Generation; valid only for data submitted pre-Cutover Time.</td> </tr> </table>	NPED	Legacy Identifier indicating Non-Price Effecting Demand; valid only for data submitted pre-Cutover Time.	NPEG	Legacy Identifier indicating Non-Price Effecting Generation; valid only for data submitted pre-Cutover Time.	PED	Legacy Identifier indicating Price Effecting Demand; valid only for data submitted pre-Cutover Time.	PEG	Legacy Identifier indicating Price Effecting Generation; valid only for data submitted pre-Cutover Time.	<p>ESB Networks will submit Meter Data using the Data Transaction Identifiers NPED and NPEG for Settlement days with timelines both before and after Cutover time ; therefore the statements ‘valid only for data submitted pre-Cutover Time’ would need to be considered for accuracy.</p>	
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NB please add extra rows as needed.