



**Single Electricity Market
(SEM)**

Trading and Settlement Code

**SEM Operational Parameters Consultation
2024**

**SEM-23-051
19 July 2023**

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1. Introduction

Under the terms of the SEM Trading and Settlement Code (TSC) Part B, the Regulatory Authorities (RAs) shall determine certain parameters proposed by the Market Operator (MO) and the TSOs, as applicable, in relation to the calculation and treatment of participants' Required Credit Cover and matters related to Imbalance Settlement.

In June 2023 therefore, the RAs requested SEMO to review the parameters utilised in the calculation of Required Credit Cover and of the Price Materiality Threshold.

On 6 July 2023, the RAs received reports from SEMO outlining their recommendations for the proposed values for the above parameters. The purpose of this consultation paper is to invite comments on SEMO's proposals as summarised in this paper and detailed within the reports from SEMO which are published alongside it.

Responses should be sent, in electronic form by close of business on 16 August 2023 to: tsc@cru.ie and mary.farrelly@uregni.gov.uk

All responses received will be provided to SEMO and may be published unless the respondent clearly indicates that their response is confidential.

2. Parameters for the Determination of Required Credit Cover

The TSC sets out the rules for the calculation of Required Credit Cover for Participants. The calculation recognises that the Required Credit Cover for each Participant is made up of known and unknown exposures. The known exposure is based on invoiced amounts and published Settlement values. The unknown exposure, called the Undefined Exposure, is based on statistical analysis of known historical values of Settlement or Pricing. New or Adjusted participants, those whose historical values of Settlement are unknown or not reflective of current levels of trade, have their Required Credit Cover calculated using forecast volumes against prices calculated from known prices, while Standard Participants have their Required Credit Cover calculated using known Settlement values.

In each of these calculations, and in the day-to-day Credit Assessment process, a number of parameters are used. Under paragraph G.10.1.1 of the TSC, the Market Operator is required to “report to the RAs at least four Months before the start of the Year”, proposing values for the parameters for the determination of Required Credit Cover. These parameters are listed and explained below:

- I. **Fixed Credit Requirement Parameter (FCR_{yp}):** This sets out the value of the Required Credit Cover that must be in place for each registered Supplier Unit or Generator Unit. A value will be required for all trading unit types, including Assetless Traders.
- II. **Number of Days in the Undefined Exposure Period g (UEPBD_g):** The number of days in the Undefined Exposure Period, g the period for which settlement amounts are not known, but where participants are, or have the ability of, incurring further liability until they are removed from the market.
- III. **Number of days in the Historical Assessment Period (DINHAP):** The number of days in the Historical Assessment Period is the number of days prior to the day of the issue of the latest relevant Settlement Document over which a statistical analysis of a Participant’s incurred liabilities shall be undertaken in order to support the forecasting of undefined liabilities for that Participant. This will be the number of historical days over which the analysis quantities, prices, or settlement values will be carried out for the purposes of forecasting values for the calculation of exposure over the Undefined Exposure Period, eventually used to determine the level of Required Credit Cover for each participant.
- IV. **Analysis Percentile Parameter (AnPP):** This is the z-score value taken from the standard normal distribution that determines the percentile confidence value that the Actual Exposure for each Participant, once determined, will fall below the estimate of the Undefined Potential Exposure.

- V. **Credit Cover Adjustment Trigger:** The expected percentage change in future generation or demand that leads a participant to report to SEMO that it should become an Adjusted Participant rather than a Standard Participant and have its Credit Cover requirements calculated from its forecasts of future demand or generation.
- VI. **Level of Warning Limit:** If the ratio of a Participant's Required Credit Cover to its Posted Credit Cover exceeds the value of this parameter a Warning Notice will be sent to the Participant.
- VII. **Level of Breach Limit:** If the ratio of a Participant's Required Credit Cover to its Posted Credit Cover exceeds this value a Credit Cover Increase Notice is issued, which will require remedy by the Participant, including by posting additional Credit Cover.

SEMO's report (SEM-23-051a), which is published alongside this consultation paper, reviews the values that these parameters have been set to since Go-Live of the revised SEM arrangements. SEMO propose to make no changes to the Required Credit Cover parameters for the 2024 calendar year, with the exception of the Number of Days in the Historical Assessment Period (HAP). This parameter has previously been set to a value of 100 days since go-live of the current market arrangements in 2018, while SEMO propose to change this to a value of 60 days for SEM year 2024.

The reason SEMO is proposing this change to the HAP is due to the volatility in market prices in the last few years. From the analysis presented by SEMO (SEM's report SEM-23-051a), the Undefined Exposure Period values and the Credit Assessment Price are similar values for 60 days and 100 days when prices are stable. However, SEMO points out that when the prices become volatile as seen since 2021, the HAP is too slow to respond. It should be noted that SEMO also proposed to amend the HAP in last year's submission but it was decided not to amend the HAP last year as the Undefined Exposure Period was reduced from 9 days to 7 days last year and it was considered that the impact of this change in the Undefined Exposure Period should be reviewed before making any change to the HAP.

Table 1 summarises SEMO's proposed values for the Credit Cover parameters.

Parameter	Approved Value for 2023	SEMO's Proposed Value for 2024
Fixed Credit Cover Requirement for Generator Units	€5,000	€5,000
Fixed Credit Cover Requirement for Supplier Units	Based on a rate of €8.77/MWh of average daily demand subject to a minimum value of €1,000 and a maximum of €15,000	Based on a rate of €8.77/MWh of average daily demand subject to a minimum value of €1,000 and a maximum of €15,000
Number of Days in the Undefined Exposure Period for each Undefined Exposure Period, g, UEPBD _g	7	7
Historical Assessment Period	100 Days	60 Days
Analysis Percentile Parameter	1.645	1.645
Credit Cover Adjustment Trigger	30%	30%
Warning Limit	80%	80%
Breach Limit	100%	100%

Table 1: Credit Cover Parameters – approved values for 2023 and proposed values for 2024

3. Price Materiality Threshold

The Price Materiality Threshold refers to the threshold, approved from time to time by the Regulatory Authorities under paragraph B.19.3.1(b) of the TSC, which is applied in the event of a Pricing Dispute or where a manifest error is identified by the Market Operator for the purpose of Repricing.

The Price Materiality Threshold tests when a change to input data as a result of an upheld dispute causes a change in the price greater than the threshold. If the Price Materiality Threshold is exceeded, the price is recalculated and included in a Settlement re-run. SEMO propose to make no changes to the value of this parameter for 2024 in their report (SEM-23-051b). This is summarised in Table 3 below.

Parameter	Approved Value for 2023	SEMO's Proposed Value for 2024
Price Materiality Threshold	5%	5%

Table 3: Price Materiality Threshold – approved value for 2023 and proposed value for 2024.

4. Next Steps

Responses are invited from interested stakeholders in relation to the values of the parameters proposed by SEMO, as summarised in this paper, and as set out in further detail in the accompanying submission from SEMO.

Responses to this consultation paper should be sent to tsc@cru.ie and mary.farrelly@uregni.gov.uk by the close of business on 16 August 2023.

All responses received will be provided to SEMO and may be published unless the respondent clearly indicates that the response is confidential.

A final decision on the parameters consulted on in this paper will be published later in 2023.