

IWEA response to the I-SEM Market Trial Strategy

03 October 2016

The Irish Wind Energy Association (IWEA) welcomes the opportunity to respond to this consultation on the I-SEM Market Trial Strategy. We welcome the publication of the Market Trial Strategy and have the following comments to make in relation to the document:

- While the document outlines that the Market Trial is not designed to assess the numerical outcomes, IWEA believes this is an important aspect that needs to be assessed before I-SEM Go Live. There is an opportunity through the scripted testing phase to ensure that particular inputs result in the expected outcomes. This could then be stress tested in the unscripted phase.
- There should be an opportunity for all companies to participate in the Market Trials if they choose to do so. The Market Trial is the only opportunity for participants to test out their market systems and trading strategies, in particular given the timelines involved. The information required will not be available in sufficient time to enable other testing opportunities to develop.
- Clear indication of the level of market readiness required needs to be given sufficiently in advance in order to for participants to meet the criteria. IWEA notes that assumption that staff should be trained before operating in the trial, and we expect that training will be provided by SEMO in this regard.
- In the event that changes are required between the Market Trial and Market Go Live these need to be clearly defined and published.
- IWEA questions whether a simplified registration approach may be available for Market Trial to enable trialling in advance of full participation or commitment.
- The document outlines that pre-defined scenarios will be used for the scripted phase of the trial, which will include wind and demand forecast. It would be important to include scenarios where these forecasts change in the Intra Day timeframe.
- It is imperative that the operational constraints on the system are accurately reflected in the Market Trial and that the flagging and tagging procedures and their impact on outcomes are properly assessed.
- The publication of the Governance Framework and the detailed timelines will be published as soon as possible to provide clarity to the industry.

We look forward to engaging in this workstream and providing input, in particular in relation to the preparation of the Market trial.