MEETING:	**System Services Code Working Group Meeting #7 November 2025**
DATE AND TIME:	12th November 2025 14:00-15:30
PARTICIPANTS:	Patrick Liddy (PL), DRAI Peter Brett (PB), Eco Power Supply Ltd. William Carr (WC), ESB Brian Mongan (BM), FERA Harry Molloy (HM), EPUKI Paul McGuckin (PMcG), Mutual Energy Andrew Burke (AB), WEI Cian Fitzgerald (CF), Energia Eoghan Cudmore (EC), Bord Gais Energy Bronagh McKeown (BMcK), UR Sumona Mukerjee (SM), CRU Muhammed Bilal Ahmed (MBA), CRU Dylan Ashe (DA), CRU Harry Enwereonu (HE), CRU Ryan Esplin (RE), NERA Carole Devlin (CD), EirGrid Brendan O'Sullivan (BOS), EirGrid Niamh Delaney (ND), EirGrid Andrew Crawford (AC), EirGrid Gerard Hanlon (GH), EirGrid Sarah Friedel (SF), SONI Juliana Jordano de Carvalho (JJC), EirGrid Malhar Desai (MD), EirGrid Grace Pender (GP), EirGrid David Clark (DC), FASS Programme Team Rachel Plomp (RP), FASS Programme Team Stephen Gannon (SG), EirGrid Martin Ward (MW), EirGrid Joe Deegan (JD), EirGrid
ABSENT:	Jessica Branigan (JBr), Matheson / IESA Michael-Allan Millar (MAM), SSE Peter Frampton (PF), VPI James Carson (CR), UR Daniel Marshman (DMa), Market Reform Brendan Ring (BR), Market Reform

PREPARED BY:	David Clark

Meeting Context

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

Agenda:

- Welcome and Introduction
- Residual Availability Determination
- System Services Supplier Charge Queries from Working Group Meeting #6
- AOB

Minutes

Welcome and Introduction

- CD welcomed the group and outlined the Agenda, Scope, SEM Committee decisions to date, PEV Table of Contents as well as Market Rules & Code Development PIR V3.0 extract (slides 2-5).
- CD noted the PEV Third Draft Table of Contents will remain the same as PEV Second Draft.
- The TSOs expect the P&S SEMC decision at the end of November and will schedule the next working group after development of the related PEV section.
- CD noted PIR V4.0 has outstanding items to be clarified with the RAs before it is ready to be published.
- CD noted progress was made where possible on Legal Draft of the System Services Code (SSC) over the summer months and that this will be shared for discussion with working group in due course. A SEMC consultation and decision will then follow.

Residual Availability Determination

RAD Key Features & Overview

- CD talked the group through the Residual Availability Determination content.
- BM queried why SS Code stipulates that service providers (SP) will be obligated to declare their availability for all system services regardless of whether they hold a DASSA order, given that the SS code relates to commercial arena for System Services unlike the Grid Code (GC). He added that he didn't consider that the SEMC have the power to modify the GC and that this would seem more appropriate for the RAs. BM further remarked that the SS Code should not have an availability obligation and potential commercial penalties as FASS is a commercial market, unlike the GC.

  Post Meeting Clarification:
  The SEMC is a sub-committee of the UR Board and the CRU Commission. They have sole jurisdiction over anything that they consider to be a SEM Matter.
  If the SEMC decides that something is a SEM Matter the UR and CRU cannot unilaterally make a decision on it. The Scheduling and Dispatch Code (SDC) is already a SEM Matter and other parts of the Grid Code can also become a SEM matter if they consider it to materially impact the SEM[1][2].

- BM queried to whom providers would be obligated to declare their availability and whether this would be workable. He considers that Providing Units are effectively being forced into a commercial agreement given penalties associated with non-delivery of a services following a system service declaration. JD responded it is a requirement that providers declare to the TSOs through the normal channels and there will be no change on how they declare their availability from DS3. BM highlighted that there should be a distinction

[1] SEM 07-565 - Joint Regulatory Statement plus annexes

[2] SEM Order Article 6 paragraph 2 The Electricity (Single Wholesale Market) (Northern Ireland) Order 2007

between TSOs governing the GC and this commercial market (FASS), highlighting that DS3 was designed to incentivise participants to provide services, not to enforce it. He considers that the TSOs are effectively forcing providers to go into a commercial arrangement. BM stated RAs and their consultants do not seem to be aware of these concerns.

- ND noted that the GC has an obligation to declare availability. BM replied it is without financial penalty. JD added there is incentive if providers are declaring availability, that the TSOs must have confidence that the service will be delivered when called upon and that this is the principle for applying an incentive. BM considers that there is blurring of boundaries between TSOs and a commercial entity given that GC signals would be used for commercial purposes. JD noted BMs feedback and agreed to take points away for further consideration.

Post Meeting Clarification:
TSOs are responsible for rule setting, management, operation and settlement of the FASS markets. The SEMC is responsible for consulting on and approving the market rules drafted by the TSOs (i.e. the SS Code). For clarity, no other entity (e.g. SEMO) will operate the FASS markets.

- BM highlighted that for services required under the GC, there may be changes to products and they may align with FASS but they are distinct and different codes. The technical GC and any financial entity would be very different.
- ND noted the terms 'product' and 'service' are sometimes used interchangeably, with some defined in GC and some outside. When the current arrangements were established, the contractual arrangements were written to refer to the definitions of those services in the Grid Code, so that they would be aligned. While new services, such as FFR, not in the Grid Code, were defined explicitly in the DS3 System Services contract. One reason for this was the length of time it takes to implement changes in the GC. ND agreed that BM is correct in that FASS is an incentive set of arrangements.
- BM reiterated that the GC is where TSOs should identify what they need. SSC should mimic the GC but that there should not be a link between the GC and SSC. ND clarified that not all services are defined in the GC, as definitions are in the DS3 System Services contracts. SIR and FFR are current examples of this.
- WC asked at what point does he become a SP as this isn't a defined term in the SSC. WC further queried is the obligation of SP or providing units through qualification or through whole portfolio. ND responded that as we are only at the stage of the PEV, these terms are not defined yet, although the term Service Provider is used in the current DS3 System Services contracts. Agreed to take the points away for consideration. JD highlighted this is the TSOs language, not the SEMC's.
- CD noted that 2 chapters in the PEV have been updated post receipt of the RAD decision and we have aligned the PEV with SEMC decisions as much as possible.
- HM queried if characteristics relating to bid submissions are consistent with SEMC decision. CD clarified this is aligned with PEV section on the DASSA which is based on SEMC DASSA Design Decision.

RAD Auction Process

- BM queried the difference between otherwise unavailable in real-time and lapsed volumes, from the RAD volume requirements summation. JD clarified that volumes otherwise unavailable in real-time relates to units for which there was no lapse notification received but for which the unit was not available for delivery of a DASSA order even though a compatible FPN was submitted to BM before Gate Closure.
- CF queried if there is potential for a DASSA order to be lapsed during the secondary trading period. He also queried if there are scenarios for which there might not be enough volume insufficiency for TSO participation in secondary trading i.e. it hasn't reached the threshold, will this volume automatically go into the RAD? JD clarified that an instance of volume insufficiency would be declared when the threshold for a particular service is exceeded, and that at this point the TSOs would enter secondary trading for the volume required. JD added we need to clarify with the RAs if any remaining insufficiency not procured through Secondary Trading would automatically go into the RAD.

- CD highlighted the TSOs have added there may be a defined RAD Auction Threshold (which may be set at zero) to the PEV, in addition to what was in SEMC decision.
- HM queried if there is a threshold of 10MW and TSOs only procured 9MW, what is an alternative to the RAD to procure the remaining volume where there is volume insufficiency. JD noted we are trying to establish a meaningful threshold and highlighted that in the Consultation Paper we have initially linked the threshold to allocation for SPs where the TSOs expect availability, but SPs are unavailable. JD added the TSOs found this would be limiting and have introduced another variable in the Recommendations Paper for a meaningful value, bearing in mind the previous example and it may be zero. JD again agreed there is a need to give more consideration volume insufficiency below the threshold. The TSO thinking is threshold values will be small.
- CF queried for instances where volume insufficiency threshold is met, would the TSOs procure all of it? JD confirmed it's the full value to be procured and highlights this in terms of a small threshold value.
- CD reverted to AB earlier query where if you don't submit RAD offer, are you out of the market or can you be accepted and if so, what price would you achieve? CD responded that the final RAD offer will be a single P-Q pair and price will be equal to RAD default price.
- CD outlined that truncation of RAD submission offers may take place and that TSOs were open to feedback on this and that it was not part of SEMC decision. WC queried for P-Q pairs, are the top or bottom prices truncated for instances where PQ pairs exceed availability. He also described an example where a unit uses 5 identical P-Q pairs for DASSA and RAD. He requested clarity on RAD payment if first 3 PQ pairs are accepted for a DASSA order. JD responded that the DASSA and RAD are separate bids but there is no commitment obligation for RAD, so it makes sense for SPs to bid their total capability.

  Post Meeting Clarification:

  In relation to the example regarding the fourth P-Q pair not being cleared in DASSA (with identical P-Q offers for DASSA and RAD), in the RAD P/Q pairs 4 – 10 are above the DASSA Clearing Price, so where a volume requirement still exists, those volumes would be paid the RAD Clearing Price capped by the DASSA Clearing Price.

- AB queried the RAD price cap and price floor in context of options for a Providing Unit that did not want to participate in RAD. He considers that a unit such as this, would not be in a position to bid at an uncompetitive level so as not to be awarded a RAD order, instead it would be forced to take the default price. He further stated that he sees FASS as a dictatorship rather than a market.
- ND responded the price cap is applied ex-post and the optimisation algorithm looks at what units are available and if they were, what is in merit and then SPs would be provided additional payment. ND queried the downside? AB noted his concern around penalties and his greater concern is building a system for a market that he considers to be worth nothing i.e. the cost of building a system is greater than what value is in the market. ND noted this and agreed to take into consideration. AB stated he doesn't want to participate in FASS as he considers it is too risky and not worth it. ND noted that for today's working group, we have a SEMC decision on the RAD and have worked on translating this decision into the PEV and are looking to bring out questions on any unclear elements on this.
- BM queried if DASSA and RAD bids are submitted at the same time. JD responded that the TSOs recommended the windows are the same as part of Parameters and Scalars Recommendation.
- BM queried that for P-Q pairs for RAD, you won't know your DASSA obligation at the time of RAD offer submission. JD agreed. BM further queried how can you adjust P-Q pairs for RAD when you don't know what will be taken up in DASSA. JD responded that RAD is ex-post so a participant won't know RAD volume requirements at time of bidding BM reverted to exampled of 5 P-Q pairs in exampled outlined by WC. JD added it is intended you are bidding for different things i.e. DASSA you are bidding with commitment obligation against it but for RAD there's no commitment obligation. If you are in merit based on bid and service requirement, you will get paid.

- BM noted that SPs just look at if there is a volume required and if they can provide it. SPs do not know if both markets will be used so they won't know how to price it. BM added that DSUs don't have other market opportunities. JD clarified that if a bid is successful and in merit in DASSA, chance there is additional volume procured in RAD. BM noted he wouldn't know the volume available in the RAD.
- CF noted that bearing in mind that RAD clearing price is capped at DASSA, it's difficult to see why you'd truncate P-Q pairs from bottom up. JD and ND agree to take point away for discussion with RAs and provide clearer position on truncation.
- AB would like to see a worked example on accepted DASSA orders. AB added that if a battery had offers accepted in DASSA and has remnant position left, this relates to price higher than those taken in DASSA as it has moved through charge states. This means it would be paid less than that, which does not seem sensible. ND and JD agreed to look at this in further detail.

RAD Publication & Reporting

- HM highlighted that 2 additional monthly reports from SEMC decision may be missing on trends for DASSA clearing price and reports when TSOs proposing to extend the RAD. JD responded and agreed to review and update list accordingly.

  Post Meeting Clarification:

  The PEV lists all the relevant reports listed in SEMC decision, there was an omission on the slide due to large amount of text, but this is now updated.

- HM also queried the feasibility study and what is included in this study. As it is a SEMC decision, believed it should not be subject to feasibility, but this issue may be down to terminology used. JD responded that the SEMC and RAs know vendor design is underway, so for any requirements from SEMC or otherwise, we need to do an assessment of whether they're implementable by the May 2027 go live. JD added the TSOs cannot ignore constraints we have. JD also noted it was flagged at the most recent Project Panel meeting (13th October) regarding Day 1, Day 1+ and Day 2 scope items.
- HM highlighted the costs for participants and lack of flexibility. HM has reservations that concerns of participants are not being considered in same way TSO concerns are. He also referred to a publication in 2014 upon which the TSOs did not deliver. ND highlighted the TSOs are implementing what the SEMC decisions are. JD added the TSOs intention is we would capture everything that needs to be implemented.
- BM queried the governance of how will Day 1 vs Day 2 items be written in the SSC on what the TSOs can't and can do. Agreed to take away point on Day 1 and Day 2 governance.
- AB highlighted if this is the only route to market for renewables but there's a possibility it will be discontinued after 2 years, it could be an expensive IT solution and highlights why he might not want to participate. ND responded the TSOs recommendation was an enduring RAD but noted point on participation is not for this forum as we are only reflecting the RAD SEMC decision. AB requested this was noted to the RAs.

System Services Supplier Charge Queries from Working Group Meeting #6

- CD took the group through the responses to the SS Supplier Charge queries from the previous working group meeting in April. There was no further comment.

AOB

- EC requested updates on;
  1. Date for publication of TSS decision paper. DA responded the RAs are working through this and are aiming to publish before Christmas.
  2. Date of Publication of the non-reserve products consultation. ND responded that the TSOs are engaging with RAs on this.
- WC queried RAD real-time availability, where if a windfarm is subject to constraint or curtailment but has qualified TOR etc., can he still participate in the RAD? JD responded

yes in DS3 if windfarms had headroom, the SPs would get paid and plan is to use very similar rules in calculations of the DASSA.

- AB requested worked examples illustrating the interaction of RAD and DASSA Offers.

Post Meeting Clarification:

There are worked examples included in Appendix 2 of the DASSA Top Up Mechanism: TSO Recommendations Paper.

Actions:

1. TSOs to confirm with RAs if any volume insufficiencies below threshold for secondary trading would automatically go into the RAD.
2. TSOs to provide further clarification on which P-Q pairs will have volume truncated by Real-Time Availability.
3. TSOs to review and update the list of RAD monthly reports in slide deck as required.

Post Meeting Clarification:
All of the requirements are listed in the PEV and the slides have been updated to correct the omission of one item