

## Response to NEMO Committee Consultation

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### Proposed Amendments to the SDAC Products Methodology

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Electricity Association of Ireland

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**A decarbonised future powered by electricity.**

**Electricity Association of Ireland**

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The Electricity Association of Ireland (EAI) is the representative body for the electricity industry and gas retail sector operating within the Single Electricity Market (SEM) on the island of Ireland.

Our membership comprises utilities that represent 90% of generation and retail business activities and 100% of distribution within the market. Our members range in size from single plant operators and independent suppliers to international power utilities. Our members have a significant presence in Ireland, Northern Ireland and Great Britain across the sector value chain. We represent the interests of the all-island market in all relevant jurisdictions, including the EU via our membership of the European electricity representative body Eurelectric.

We believe that electricity has a fundamental role in providing energy services in a decarbonised, sustainable future, in particular through the progressive electrification of transport and heating. We believe that this can be achieved, in the overall interest of society, through competitive markets that foster investment and innovation.

We promote this vision through constructive engagement with key policy, regulatory, technology and academic stakeholders both at domestic and EU levels.

Our ambition is to contribute to the realisation of a net-zero GHG emissions economy by 2050 or sooner, in order to limit the impact of rising temperatures. Electricity offers opportunities to decarbonise the Irish economy in a cost-effective manner.



## Introduction

The Electricity Association of Ireland (EAI) welcomes the opportunity to respond to the NEMO Committee's consultation on the proposed amendments to the SDAC Products Methodology as determined by Article 40 (3) of CACM.

EAI wishes to express strong support for the continued inclusion of Scalable Complex Orders (SCOs) within the SDAC Products Methodology. As evidenced in Section 3.3 of the explanatory note, SCOs are utilised with high volumes in certain regions, most notably within the Single Electricity Market (SEM) with up to 21%. This reflects the important role these order types play in enabling market participants across the island of Ireland to accurately represent operational, technical, and commercial constraints within the day-ahead timeframe. Their use is a fundamental component of effective participation in the SEM.

We recognise the SDAC product methodology is to be consulted on every two years and this process factors in the products and order types that can be taken into account and used when submitting buy and sell orders in the SDAC. We are pleased to note that the existing SDAC product methodology is to be maintained and EAI fully supports this approach.

We welcome continued engagement with market participants on the regular review of SDAC products and look forward to further engagement with the NEMO Committee on any future developments. If you require any clarification or have questions, please do not hesitate to contact these offices.

Yours sincerely,



**Alex Murphy**

Policy Analyst

Electricity Association of Ireland

