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Sarah Friedel
Castlereagh House
12 Manse Road
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Our Ref: MAR-25-1061

Date: 17 December 2025

Dear Sarah,

RE: Day Ahead and Intraday Arrangements concerning more than one Nominated Electricity Market Operator (NEMO) in the SEM Bidding Zone.

I am writing in response to the request from SONI for National Regulatory Authority (NRA) approval for a proposal under Article 9(8) of the Capacity Allocation and Congestion Management (CACM) Regulation 2015/1222.

Under Article 9(8) of the CACM Regulation, the Utility Regulator (UR) as National Regulatory Authority received a proposal on 23 June 2025 from the TSOs (SONI and EirGrid) concerning cross-zonal capacity allocation and other necessary arrangements in bidding zones where more than one NEMO is designated and/or offers trading services in line with Article 45 and 57 of the Regulation.

This letter sets out the UR decision to request amendment to the proposal in order to clarify the key aspects of the proposal and fulfil requirements under the CACM Regulation by reflecting proposed timescale for its implementation and a description of its expected impact on the objectives of this Regulation.

An equivalent letter requesting the same amendments will be communicated by the Commission for Regulation of Utilities (CRU), colleagues from CRU are copied on this letter.

Proposal

The Regulatory Authorities, the CRU and UR, have jointly assessed the proposal and have engaged at working level with SONI and EirGrid with our queries.

Through these engagements, we have determined that there are a number of areas where amendment is necessary for the proposal to clarify key aspects of the proposal and fulfil the requirements set out in the CACM Regulation. These areas relate to signposting of other documents; the fallback arrangements; timelines for implementation; the impact on the CACM objectives; and minor corrections including clarifications and spelling mistakes.

Next Steps

Based on the above considerations, the UR and CRU do not consider this proposal in its current form to meet the requirements of CACM and the expectations of a proposal under Articles 45 and 57 of same.

The RAs have therefore agreed to request the following amendments to the 'Multiple NEMO Arrangements' proposal submitted by the TSOs per Article 9(12) of the CACM Regulation:

- **Signposting:** The proposal makes reference throughout to detailed agreements, process documents and methodologies that have been established to implement the CACM Regulation at the regional and European level including the Day Ahead Operations Agreement, Intra-Day Operations Agreement, Scheduled Exchange Methodology, Core CCR Capacity Calculation Methodology for Day Ahead, Core CCR Capacity Calculation Methodology for Intra-Day and Core CCR fallback procedures. Amendments should be made to the proposal to cite the relevant parts of these documents in the proposal or, where not possible, in the explanatory document. The explanatory document should be published alongside the MNA arrangements, which is required to be published by Article 9(14) of the Regulation.
- **Fallback arrangements:** Article 6 of the proposal should be amended to ensure that there is clarity around the fallback arrangements that will be in place at go live of the MNA arrangements if the Core fallback arrangements are not agreed.
- **Timelines for implementation:** Article 7 of the proposal includes the go live date of the arrangements as the fourth quarter of 2026. This should be amended to account for the delays to the Celtic Interconnector, as required.
- **Impact on the CACM objectives:** Article 9(9) of the CACM Regulation requires the proposal to include a description of its expected impact on the objectives of the CACM Regulation.
- **Corrections and clarifications:** There are a number of corrections and clarifications that the team believe need to be made to the document to ensure accuracy, including spelling mistakes. These are:
 - Ensuring that all of the relevant terminology used in the proposal is defined in Article 2;

- Correcting references to the 'Day Ahead Operations Agreement' and 'Intra-Day Operations Agreement' in Article 3(3);
- Clarifying the references to 'methodology' and 'methodologies' in Article 3(4) and 3(5) to specify which methodologies relate to which articles of the CACM Regulation;
- Clarifying reference to Article 30(3) referred to in Article 4(4) as being Article 30(3) of the CACM Regulation;
- Rewording Article 5(5) to read 'as stated in Article 58 of the CACM Regulation'; and
- Correcting the spelling mistake in Article 10 and including a reference to Article 9(14) of the CACM Regulation.

The amended documents should be submitted with both clean versions and a version with all changes tracked.

If you have any queries regarding the information contained within this letter please contact niall.robb@uregni.gov.uk.

Yours sincerely,

(Sent by email with no signature)

Colin Broomfield
Director
Markets
Utility Regulator

cc: Michael Atcheson
Stephen Douglas
Liam McLoughlin
John Melvin
Barry Hussey