# **FASS Programme**

Phased Implementation Roadmap (PIR) V2.0

September 2024





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## **Version History**

Artefact	Description of change	Date
Phased Implementation Roadmap 1.0	Baseline PIR.	March 2024
Phased Implementation Roadmap 2.0	<ul><li>Updates to PIR to include:</li><li>L2 milestones for January to June 2025.</li></ul>	September 2024
	<ul><li>Programme milestone descriptions.</li><li>Risks / Issues.</li></ul>	

# **Background Documentation**

Artefact	Link
SEM-21-021 System Services Future Arrangements - Decision Paper 1	<u>SEMC</u>
SEM-22-012 System Services Future Arrangements High Level Design Decision Paper 2	<u>SEMC</u>
SEM-23-103 System Services Future Arrangements - Detailed Design & Implementation - Phased Implementation Roadmap - Decision Paper 3	<u>SEMC</u>
SEM-24-066 System Services Future Arrangements - DASSA Design Decision Paper	<u>SEMC</u>
Phased Implementation Roadmap (PIR) V1.0	SONI Link EirGrid Link

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## **Preface**

As Transmission System Operators (TSOs), SONI and EirGrid are separately bound by national and European legislation. Under the Climate Action and Low Carbon Development (Amendment) Act 2021<sup>1</sup> and the Climate Action Plan 2023<sup>2</sup> (CAP23) in Ireland, carbon budgets and the Climate Change Act (Northern Ireland) 2022<sup>3</sup> in Northern Ireland, the TSOs are each separately responsible for delivering low-carbon reserve services to support the 2030 decarbonisation targets in their respective jurisdictions.

At a European level, the Clean Energy Package (CEP)<sup>4</sup> has set the foundation for a new electricity market design with the objective of modernising Europe's electricity market, promoting enhanced flexibility and integrating renewable energy through market driven solutions. The CEP builds on the Electricity Balancing Guideline (EBGL)<sup>5</sup> Network Code, directing each TSO to procure system services in an efficient, economic and market-based manner for their jurisdiction. In particular, the legislation directs that balancing capacity (reserve services) should be procured on a short-term basis to the extent possible with a derogation required for contracting periods longer than one day.

To accommodate these regulatory adjustments, the SEM Committee (SEMC) published its High-Level Design (HLD) in SEM-22-012<sup>6</sup> in April 2022. The High-Level Design laid out a phased introduction of a range of market arrangements to facilitate the move to a competitive framework for the procurement of reserves, including delivery of the Day Ahead System Services Auction (DASSA). In December 2023, the SEMC published their decision (SEM-23-103)<sup>7</sup> on the System Services Future Arrangements, which set out a draft Phased Implementation Roadmap (PIR) and directed the TSOs to publish the TSOs' Phased Implementation Roadmap in Q1 2024. The first iteration (V1.0) of the Phased Implementation Roadmap<sup>8</sup> was published in March 2024 post SEMC approval fulfilling this requirement.

<sup>&</sup>lt;sup>1</sup> Climate Action and Low Carbon Development (Amendment) Bill 2021 (gov.ie)

<sup>&</sup>lt;sup>2</sup> Climate Action Plan 2023 (gov.ie)

Climate Change Act (Northern Ireland) 2022 (legislation.gov.uk)

<sup>&</sup>lt;sup>4</sup> Regulation (EU) 2019/943 on the internal market for electricity (eur-lex.europa.eu), Directive (EU) 2019/944 on common rules for the internal market for electricity and amending Directive 2012/27/EU (eurlex.europa.eu)

<sup>&</sup>lt;sup>5</sup> Regulation (EU) 2017/2195 establishing a guideline on electricity balancing (EGBL) (eur-lex.europa.eu)

SEM-22-012 System Services Future Arrangements High Level Design Decision Paper.pdf (semcommittee.com)
SEM-23-103 System Services Future Arrangements Phase III: Detailed Design & Implementation Decision Paper.pdf (semcommittee.com)

Phased Implementation Roadmap V1.0

# **Executive Summary**

The Phased Implementation Roadmap (PIR) outlines the programme roadmap for the delivery of the Future Arrangements for System Services (FASS) and focuses on the key programme activities and milestones leading to a December 2026 go-live date. This document presents the second iteration (V2.0) of the Phased Implementation Roadmap.

The target go live date for the FASS Programme remains December 2026 which the TSOs believe to be achievable at this time. The overall confidence in this timeline is medium which is typical for this stage of a programme of this scale and complexity. Confidence in the timeline will increase through clarity by way of SEMC decisions (at the agreed milestones dates) and once IT vendors have mobilised and committed to working to programme timelines. In the interest of transparency, programme implementation risks have been outlined in the appendix of this document.

Effective collaboration and timely decision making are crucial for successfully delivering the FASS Programme by the timelines set out in this document. There are several consultations, SEMC decisions and RA approvals required to deliver the FASS Programme. To mitigate this risk, the RAs and TSOs have implemented a document sharing process which continues to work well. Further, the TSOs are committed to revising recommendations if they become incompatible with subsequent decisions, endeavouring to provide reassurance to industry that the design is agreed and understood by all parties.

Lastly, the TSOs acknowledge the necessity for clear and transparent communication and providing timely updates to industry to facilitate their own programme deliveries. Monthly updates on the status of the programme will continue to be provided through the Future Power Markets Industry Workshop forum, and continued engagement from industry is encouraged at these sessions.

#### **Key Points:**

- Bi-annual evaluation of the roadmap, and separately funding approval, as required, is essential to deliver timeline. The next iteration of the PIR (V3.0) will be published in March 2025.
- Timeline confidence rises to medium which is typical at this stage in a programme of this scale and complexity.
- Non-Reserve services activities have been consolidated into a single consultation and recommendations paper to allow greater feedback from industry on the procurement mechanism, products, volumes, and locations for these services.
- An additional workstream 'Real Time Security Arrangements' has been added to PIR V2.0.
- Drafting of the System Services Code Plain English has been extended by one month with a revised target date of January 2025. An additional second draft of the code is also included in the programme plan.
- An additional consultation on Parameters and Scalars has been added to the programme plan.
- Industry engagement and market readiness have been given dedicated programme activities.
- Future consultation and recommendations for day 2 DASSA Arrangements activities have been added to the level 1 programme plan to commence in 2026.
- Risks and mitigations that could delay the go-live date of December 2026 are detailed in PIR V2.0.
- Open milestone descriptions have also been included in this iteration of the PIR.

# Introduction

On 8th December 2023, the SEMC released a decision paper on the Detailed Design and Implementation of Future Arrangements for System Services (FASS). Within SEM-23-103, the SEMC released their Phased Implementation Roadmap (PIR) and set out a number of requirements for the FASS Programme informing the TSOs' next steps.

The TSOs published PIR V1.0 in March 2024 which was approved by the SEMC. As set out in PIR V 1.0 every six months the TSOs will conduct a comprehensive assessment of the PIR. This document provides an update to the PIR V1.0 based on this assessment, with monthly granularity of timelines provided until June 2025.

The purpose of this paper is to address the requirements set out by the SEMC in SEM-23-103 and to release the TSOs' Phased Implementation Roadmap V2.0.

Below is a summary of the outputs from the SEMC decision (SEM-23-103) pertaining to the publication of the PIR.

- TSOs to assess the SEMC Decision and draft Phased Implementation Roadmap published on December 8th, 2023.
- TSOs to assess the timing of deliverables impacted by the decision and if deliverables are achievable within the proposed timelines.
- TSOs to respond to the SEMC Decision Paper with an updated roadmap for the FASS Programme, subject to approval by the SEMC. This response should specify if the December 2026 go-live date is still achievable and outline any risks or issues that could delay this go-live date.
- TSOs to proceed with priority deliverables, as set out by the TSOs and approved by the SEMC.
- TSOs to provide updates on progress to the FASS Project Panel every two months.

The December 2026 go-live date is dependent on timely SEMC decision making and programme funding. Any delays in decision making will likely have a knock-on effect on other workstreams and potentially delay the DASSA go-live. Risks to the go-live date are detailed in later in this document. The requirement for funding is included within the roadmap as a pre-requisite. At this time, the TSOs have received notification that programme funding is approved with formal approval to follow in near future.

# **Approach**

The TSOs acknowledge the necessity of providing clear timelines to industry to facilitate their own programme deliveries. Considering this and the current level of confidence in the programme timelines, the TSOs propose to continue the bi-annual evaluation of the Phased Implementation Roadmap (PIR).

This document presents a condensed overview of the programme in both a Level 1 and Level 2 format. Level 1 outlines the overarching plan covering the entire duration of the DASSA Arrangements implementation, while the Level 2 detailed in this paper provides a more granular plan specifically focused on July 2024 - June 2025.

### **Frequency**

Every six months, the TSOs will continue to conduct a comprehensive assessment of the PIR, which is detailed in the Level 2 Plan. Specific milestone and workstream timelines will be outlined for the subsequent six-month period. Any changes to programme scope or timeline will be managed through agreed RA TSO change control processes.

#### Governance

Programme Governance is crucial to maintaining programme progression and delivering to the programme plan below. The PIR is to be managed by agreed RA/TSO all island governance arrangements which will facilitate efficient decision making and allow for changes to be managed appropriately and mitigate programme delivery risks through proactive and transparent engagement with industry and RAs. The RAs and TSOs have established a process whereby information and draft papers are shared during development to maximise efficiency.

#### Confidence In Timeline

Currently, the TSOs have an overall medium level of confidence in timelines. This is typical at this early stage in programmes of this scale and complexity. More detailed timelines cannot be provided until,

- Formal funding approval from the CRU and UR for Phases 3-4 is received.
- IT Vendors are mobilised and ready for kick-off.

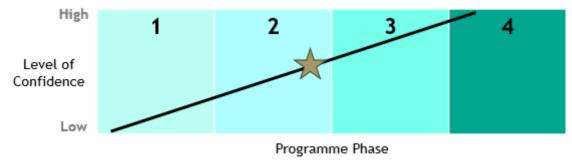


Figure 1: Anticipated Level of Confidence by Programme Phase

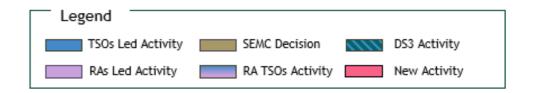
# Phased Implementation Roadmap

This section of the document provides an overview of the FASS Programme Plan in both a level 1 and level 2 format in addition to relevant programme milestones until June 2025. The TSOs will develop the PIR iteratively providing more granular detail as the FASS Programme progresses.

- Level 1 outlines the overarching plan covering implementation of the DASSA Arrangements with a go live of December 2026.
- Level 2 provides further granularity, specifically focused on the outlook for July 2024 to June 2025, including key programme milestones.
- Overview of programme milestones until June 2025, including milestone owners and interdependencies

For ease of review, changes to the level 1 and level 2 roadmaps have been highlighted. New or amended activities have been highlighted in pink and new milestones for 2025 have a green outline. Additionally, tracked changes of updates made to the Milestone Reference List since publication of PIR V1.0 in March 2024 have been included in the appendix.

# Phased Implementation Roadmap - Level 1 V2.0



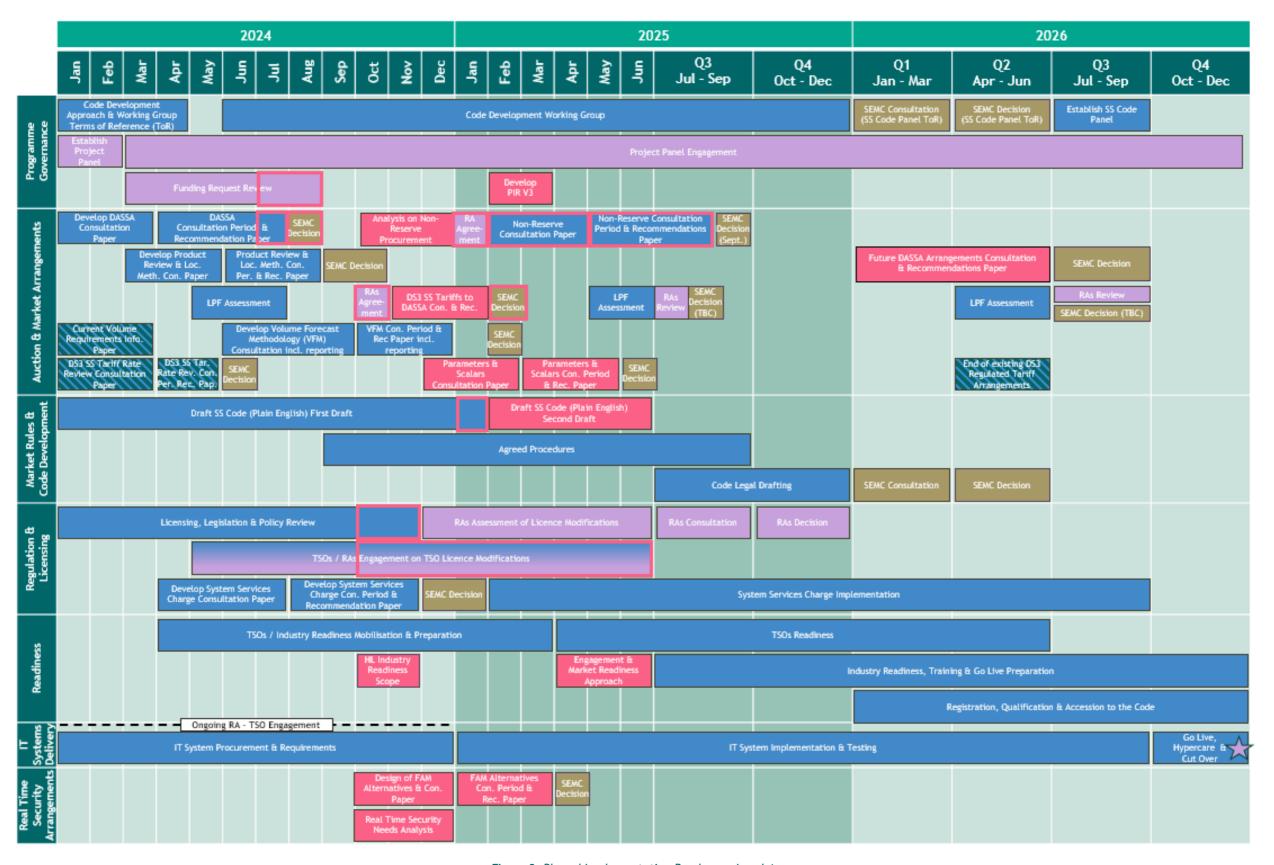


Figure 2: Phased Implementation Roadmap - Level 1

#### Phased Implementation Roadmap -Legend TSOs Led Activity SEMC Decision Milestone New Activity Level 2 V2.0 RAS /TSOs Activity NS3 Activity RAS Led Activity New Milestone 2024 2025 September October November December January February March April May July August June Code Development Working Group PIR No. 3 PIR No. 2 Analysis on Non-Reserve Procurement Non-Reserve Consultation Paper Product Review and Locational Parameters & Scalars Consultation Period & (28) 36 SEMC Decisio **SEMC Decision** Parameters & Scalars Consultation Paper DS3 SS Tariffs to DASSA Consultation Period & Annual LPF Assessment (VFM) Consultation Paper including Volumes Requirements Reporting Paper including Volumes Requirements Reporting -22 Draft SS Code (Plain English) First Draft Draft SS Code (Plain English) Second Draft **Draft Agreed Procedures** Ongoing Licensing, Legislation & Policy Review 25 TSOs / RAs Engagement on TSO Licence Modifications Grid Code Review Potential: Grid Code Modifications Implementation ◈ System Services Charge Consultation Period & Recommendations Paper • System Services Charge Implementation TSOs / Industry Readiness Mobilisation & Preparation TSOs Readiness High-Level Readiness Scope Business Process Design Engagement & Market Readiness Approach Ongoing RA - TSO Engagement IT System Procurement & Requirements IT System Implementation & Testing 33 SEMC Decisi Design of FAM Alternatives & Consultation Paper Real Time Security Needs Analysis

Figure 3: Phased Implementation Roadmap - Level 2

## **Milestone Reference List**

Milestone #	Milestone Name	Milestone Dependencies	Milestone Owner	Milestone Target Quarter	Milestone Target Date	Status
FASS.01	Establish The Project Panel	-	RAs	Jan - Mar 2024	February 2024	Complete
FASS.02	SEMC Decision on Phased Implementation Roadmap	-	SEMC	Jan - Mar 2024	February 2024	Complete
FASS.03	Commence IT Systems Procurement	FASS.02	TSOs	Jan - Mar 2024	February 2024	Complete
FASS.04	Publish Phased Implementation Roadmap 1	FASS.02	TSOs	Jan - Mar 2024	March 2024	Complete
FASS.05	Publish FASS Daily Auction/Procurement Design Consultation Paper	FASS.04	TSOs	Jan - Mar 2024	March 2024	Complete
FASS.06	Commence Detailed Requirements	-	TSOs	Jan - Mar 2024	March 2024	Complete
FASS.07	Establish System Service Code Development Working Group Terms of Reference	FASS.04	TSOs	Apr - Jun 2024	April 2024	Complete
FASS.08	Issue List of Proposed Licence Modifications to RAs	-	TSOs	Apr - Jun 2024	November 2024	In Progress
FASS.09	Publish FASS Daily Auction Product Review and Locational Methodology Consultation Paper	-	TSOs	Apr - Jun 2024	May 2024	Complete
FASS.10	FASS Programme Funding Request Approval	-	RAs	Apr - Jun 2024	June 2024	Complete
FASS.11	Publish FASS Daily Auction/Procurement Design Recommendation Paper	FASS.05	TSOs	Apr - Jun 2024	June 2024	Complete
FASS.12	SEMC Decision on FASS Daily Auction/Procurement Design	FASS.11	SEMC	Jul - Sep 2024	July 2024	Complete
FASS.13	Publish Annual Layered Procurement Assessment Recommendations Paper 2024	-	TSOs	Jul - Sep 2024	July 2024	Closed*
FASS.14	Publish FASS Daily Auction Product Review and Locational Methodology Recommendation Paper	FASS.09	TSOs	Jul - Sep 2024	August 2024	Closed*
FASS.15	Commence Grid Code Review	FASS.14	TSOs	Jul - Sep 2024	September 2024	Mobilising

Milestone #	Milestone Name	Milestone Dependencies	Milestone Owner	Milestone Target Quarter	Milestone Target Date	Status
FASS.16	Publish Phased Implementation Roadmap 2	FASS.04	TSOs	Jul - Sep 2024	September 2024	Complete
FASS.17	SEMC Decision on FASS Daily Auction Product Review and Locational Methodology	FASS.14	SEMC	Oct - Dec 2024	October 2024	In Progress
FASS.18	SEMC Decision on Annual Layered Procurement Assessment 2024 (if required)	FASS.13	SEMC	Jul - Sep 2024	September 2024	TBC (if required)
FASS.19	Issue System Services Charge Recommendations Paper	-	TSOs	Oct - Dec 2024	November 2024	In Progress
FASS.20	Publish High Level Readiness Scope	FASS.12	TSOs	Oct - Dec 2024	November 2024	Not Started
FASS.21	Issue Volume Forecasting Methodology Recommendation Paper including Volumes Requirements Reporting	FASS.17	TSOs	Oct - Dec 2024	December 2024	Not Started
FASS.22	Draft Plain English Version of SS Code - Frist Draft	FASS.07 FASS.12 FASS.17	TSOs	Jan - Mar 2025	January 2025	In Progress
FASS.23	Commence Analysis of options for Non-Reserve Procurement, including LPF	-	TSOs	Oct - Dec 2024	October 2024	New
FASS.24	Mobilise Real Time Security Arrangements workstream (FAM Alternatives)	FASS.12	RAs & TSOs	Oct - Dec 2024	October 2024	New
FASS.25	Share suggested approach to TSO licence modifications	-	TSOs	Oct - Dec 2024	November 2024	In Progress
FASS.26	RAs agreement on Analysis of options for Non-Reserve Procurement, including LPF	FASS.23	RAs	Jan - Mar 2025	January 2025	New
FASS.27	SEMC Decision on System Services Charge	FASS.19	SEMC	Jan - Mar 2025	January 2025	New
FASS.28	Publish Parameters and Scalars Consultation Paper	FASS.12 FASS.17	TSOs	Dec - Feb 2025	February 2025	New
FASS.29	SEMC Decision on DS3 SS Tariffs to DASSA	FASS.12	SEMC	Jan - Mar 2025	February 2025	New

Milestone #	Milestone Name	Milestone Dependencies	Milestone Owner	Milestone Target Quarter	Milestone Target Date	Status
FASS.30	SEMC Decision on Volume Forecasting Methodology including Volumes Requirements Reporting	FASS.21	SEMC	Jan - Mar 2025	February 2025	New
FASS.31	Publish Phased Implementation Roadmap V3.0	-	TSOs	Jan - Mar 2025	March 2025	New
FASS.32	Commence DASSA System Implementation**	-	TSOs	Jan - Mar 2025	March 2025	New
FASS.33	Issue Real Time Security Arrangements workstream (FAM Alternatives) Recommendation Paper	FASS.24	TSOs	Jan - Mar 2025	March 2025	New
FASS.34	Publish Non-Reserve Procurement, Products, Volumes & Locations Consultation Paper***	FASS.26	TSOs	Apr - Jun 2025	April 2025	New
FASS.35	SEMC Decision on Real Time Security Arrangements workstream (FAM Alternatives)	FASS.33	SEMC	Apr - Jun 2025	April 2025	New
FASS.36	Issue Parameters and Scalars Recommendations Paper	FASS.28	TSOs	Apr - Jun 2025	May 2025	New
FASS.37	SEMC Decision on Parameters and Scalars	FASS.36	SEMC	Apr - Jun 2025	June 2025	New
FASS.38	Issue Annual Layered Procurement Assessment Recommendations Paper 2025	-	RAs	Apr - Jun 2025	June 2025	New
FASS.39	Draft Plain English Version of System Services Code - Second Draft	FASS.22 FASS.29 FASS.30 FASS.35 FASS.37	TSOs	Apr - Jun 2025	June 2025	New
FASS.40	Complete preparation for RAs Consultation on Licence Modifications	-	RAs	Apr - Jun 2025	June 2025	New
FASS.41	Publish Engagement & Market Readiness Approach	FASS.20	TSOs	Apr - Jun 2025	June 2025	New

#### Notes:

- \*Pending further engagement and / or publication to SONI / EirGrid websites
- \*\*Further clarity by way of IT implementation timelines to be detailed in PIR V3.0 post vendor onboard expected early 2025.
- \*\*\*In the interest of efficiencies and accounting for feedback received, the TSOs will endeavour to deliver the procurement, product and volume forecasting design for non-reserve products as a single consultation and recommendation paper. The TSOs reserve the right however to review this approach should it be required.

# Level 2 Milestone Descriptions (Open milestones, July 2024 - June 2025)

Milestone #	Milestone Name	Milestone Description
FASS.08	Issue List of Proposed Licence Modifications to RAs	TSOs to conduct an analysis, with RA input, on the SEMC decision papers and relevant EU legislation to highlight where there are gaps which may require licence modifications to establish a licence framework that implements the SEMC decisions.
FASS.15	Commence Grid Code Review	Following the issuing of the Product Review Recommendations Paper, TSOs to commence review of the Grid Code to determine if modifications are required to align with any changes to the products.
FASS.16	Publish Phased Implementation Roadmap 2	TSOs to publish an update to the Phased Implementation Roadmap, providing monthly granularity of timelines until June 2025.
FASS.17	SEMC Decision on FASS Daily Auction Product Review and Locational Methodology	SEMC to publish a Decision Paper on the FASS Daily Auction Product Review and Locational Methodology.
FASS.18	SEMC Decision on Annual Layered Procurement Assessment 2024 (if required)	SEMC to publish a Decision on based on the TSOs' assessment of the need to introduce and leverage the Layered Procurement Framework at this time if required.
FASS.19	Issue System Services Charge Recommendations Paper	TSOs to issue a Recommendation Paper on System Services Charge to the RAs. The paper will be informed by Industry's feedback as collected in the consultation and RA input. TSOs to publish the Recommendation Paper, post engagement with the RAs.
FASS.20	Publish High Level Readiness Scope	TSOs to publish a high-level overview document setting out the candidate scope of the programme's readiness activities for impacted stakeholders. Additionally, TSOs will issue an optional industry survey to gauge stakeholder readiness at this stage in the programme.
FASS.21	Issue Volume Forecasting Methodology Recommendation Paper including Volumes Requirements Reporting	TSOs to issue a Recommendation Paper on methodology to determine the volume of reserve services to be procured in the DASSA and the associated reporting. The paper will be informed by Industry's feedback as collected in the consultation and RA input. TSOs to publish the Recommendation Paper, post engagement with the RAs.
FASS.22	Draft Plain English Version of System Services Code - First Draft	TSOs to complete the first draft of the Plain English Version of the System Services Code, based on SEMC Decisions issued to date and input from the System Services Code Working Group. Note: Where open design decisions remain, sections will be draft or left as placeholder until formal direction on design is received.
FASS.23	Commence Analysis of options for Non- Reserve Procurement, including LPF	TSOs to commence analysis that will inform later consultation paper. This will cover the procurement mechanism, considering the use of the LPF, and approach for non-reserve products post DASSA golive.

Milestone #	Milestone Name	Milestone Description
FASS.24	Mobilise Real Time Security Arrangements workstream (FAM Alternatives)	The RAs and TSOs to commence option analysis and assessment of FAM alternatives for delivery either alongside the scheduled DASSA go-live date or post go-live.
FASS.25	Share suggested approach to TSO licence modifications	TSOs to share a suggested approach to update the TSOs' licences including to establish the legal basis for the System Services Code.
FASS.26	RAs agreement on Analysis of options for Non-Reserve Procurement, including LPF	RAs to agree on the analysis completed by the TSOs on the procurement approach for each non-reserve product post DASSA go-live. Please note: This is not a SEMC Decision point and does preempt industry input on the subsequent consultation (FASS.34). However, the TSOs consider early input from the RAs as critical in order to deliver the holistic design for non-reserve services as a single consultation paper.***
FASS.27	SEMC Decision on System Services Charge	SEMC to publish a decision on the System Services Supplier Charge.
FASS.28	Publish Parameters and Scalars Consultation Paper	TSOs to publish a Consultation Paper on the parameters and scalars that are to be applied in the DASSA Arrangements. The parameters addressed will include the compensation payment and the value functions used in the DASSA, among others.
FASS.29	SEMC Decision on DS3 SS Tariffs to DASSA	SEMC to publish a Decision Paper on the arrangements to be in place for the period between the current DS3 Regulated Arrangements end date (April 2026) and DASSA Go Live (December 2026).
FASS.30	SEMC Decision on Volume Forecasting Methodology including Volumes Requirements Reporting	SEMC to publish a Decision Paper on the methodology to determine the volume of reserve services to be procured in the DASSA and the associated reporting.
FASS.31	Publish Phased Implementation Roadmap V3.0	TSOs to publish the third iteration of the Phased Implementation Roadmap.
FASS.32	Commence DASSA System Implementation	Post vendor onboard, TSOs to commence IT System Implementation and Testing of the DASSA platform. Early IT implementation activities for other systems to commence earlier where possible.
FASS.33	Issue Real Time Security Arrangements (FAM Alternatives) Recommendations Paper	TSOs to issue a Recommendations Paper on the Real Time Security Arrangements (FAM Alternatives). The paper will be informed by Industry's feedback as collected in the consultation and RA input. TSOs to publish the Recommendation Paper, post engagement with the RAs.
FASS.34	Publish Non-Reserve Procurement, Products, Volumes & Locations Consultation Paper	TSOs to publish a consultation paper on the procurement mechanism, Products, Volumes and Locational Methodology Arrangements for non-reserve products post DASSA go-live.
FASS.35	SEMC Decision on Real Time Security Arrangements (FAM Alternatives)	SEMC to publish a decision on the Real Time Security Arrangements (FAM Alternatives) recommendation paper.

Milestone #	Milestone Name	Milestone Description
FASS.36	Issue Parameters and Scalars Recommendations Paper	TSOs to issue a Recommendations Paper on the parameters and scalars to the SEMC that are to be applied in the DASSA Arrangements. The parameters addressed will include the compensation payment, and the value functions used in the DASSA, among other configurable design parameters. The paper will be informed by Industry's feedback as collected in the consultation and RA input. TSOs to publish the Recommendation Paper, post engagement with the RAs.
FASS.37	SEMC Decision on Parameters and Scalars	SEMC to publish a Decision Paper on the parameters and scalars that are to be applied in the DASSA Arrangements.
FASS.38	Issue Annual Layered Procurement Assessment Recommendations Paper 2025	TSOs to complete an assessment of the need to introduce and leverage the Layered Procurement Framework at this time.
FASS.39	Draft Plain English Version of SS Code - Second Draft	TSOs to complete the second draft of the Plain English Version of the System Services Code, based on SEMC Decisions issued to date and input from the System Services Code Working Group. Note: Where open design decisions remain, sections will be draft or left as placeholder until formal direction on design is received.
FASS.40	Complete preparation for RAs Consultation on Licence Modifications	RAs to complete preparation for 28-day consultation on the license modifications required for FASS go-live.
FASS.41	Publish Engagement & Market Readiness Approach	TSOs to publish an initial overview document setting out the programme's readiness approach for impacted stakeholders.

# **Appendix**

## Appendix A: Risks to Go-Live

The RAs have requested that the TSOs outline any risks or issues that could delay the go-live date of December 2026. While there are no open issues that could delay the December 2026 go-live date, the TSOs are monitoring and reporting on the below risks which may impact the go-live date. TSOs will continue to closely monitor these risks with the RAs, seeking to mitigate where possible.

Risk Name	Risk Description		Mitigation
Migration from DS3 to FASS Arrangements	There is a risk that the arrangements chosen to transition from the current DS3 System Services Regulated Arrangements to FASS are complex. Any new arrangements would require resources to be reassigned from the FASS programme, resulting in delays to the FASS go-live date.	High	Detailed transition planning to be undertaken to ensure a smooth transition. Clear communication and timely decision making and input by the RAs will be key to mitigating this risk.
Timeliness of Approvals	There is a risk that SEMC decision making and RA approval(s) could take longer than anticipated, resulting in delays to the FASS go-live date.	Medium	Joint RAs and TSOs All Island Programme (AIP) governance arrangements <sup>9</sup> has now been established to avoid undue delays. Additionally, an RA/TSO document sharing process is in place to facilitate early insight and increased understanding between both parties and is working well.
SME Resource Availability	There is a risk that the high demand on SME resources across the TSOs may impact their capacity to support the FASS Programme, resulting in potential delays to the FASS go-live date.	Medium	TSO programme teams are staffed and engaged to continue work at pace, final funding approval will allow TSOs to secure long term resourcing. External resources are being sought to mitigate internal constraints where possible. Timely and extensive engagement is required from key stakeholders to foresee any arising complexities in advance.

<sup>&</sup>lt;sup>9</sup> AIP\_Approach to Governance and Revenue Recovery Arrangements.pdf (semcommittee.com)

Risk Name	Risk Description	Severity	Mitigation
IT Vendor Onboard	There is a risk that the IT vendor to deliver the FASS solution has not yet been selected, and therefore has not provided input into the programme planning. This presents a risk to the IT delivery timelines and the FASS go-live date. IT vendor onboarding is anticipated ahead of PIR V3.0.	Medium	Timely and extensive engagement is required from key stakeholders to foresee any arising complexities in advance.
Service Provider OEM Operational Testing	There is a risk that service providers will need to make significant changes to their technology in order to provide newly defined system services. Feedback has been received through the Product Review & Locational Methodology consultation paper that significant engagement between providers and their OEM will be needed to test their ability to provide newly defined "faster" services. This may have a knock-on impact on overall programme timelines.	Medium	Monthly engagement with services providers is facilitated via the Future Power Markets Industry Workshop forum. Additionally, the TSOs will begin engagement with impacted stakeholders on the programme's readiness activities via milestones FASS.20 and FASS.41. Further activities will also be included as part of PIR V3.0.
IT Vendor Capacity	There is a risk that IT vendors are unable to deliver on programme requirements leading to increased manual complexity. Operation of the FASS solution may prove more complex than expected.	Medium	Timely and extensive engagement is required from key stakeholders to foresee any arising complexities in advance.
SONI LC42 Implementation	The implications of licence condition 42 in the SONI licence on the programme have not yet been fully considered, as such the programme time and cost estimates are prepared on the assumption that licence condition 42 has not been implemented. Programme timelines and estimates would need to be revisited based on the implementation of licence condition 42 in the SONI TSO licence.	Medium	Agreed Governance jointly collated by TSOs, and RAs will allow necessary communication and engagement between TSOs and RAs to avoid undue risk and cost.
Holistic FASS Design	The final holistic FASS design is not known at this time with further SEMC decisions to follow. There is a risk that this will drive changes to the estimated programme costs.	Low	Extensive engagement through existing formal channels to ensure that there is a consistent understanding of programme scope and sufficient buy-in from key stakeholders.
Day 2 Scope	Day 2 scope, if required, will be captured as a separate capital programme. There is a risk that a day 2 solution and/or additional workstreams will add complexity and costs should activities be required to run in parallel with planned Day 1 implementation activities.	Low	Extensive engagement through existing formal channels to ensure that there is a consistent understanding of programme scope and sufficient buy-in from key stakeholders.

## **Appendix B: Milestone Reference List - With Tracked Changes**

For ease of review, the TSOs have included tracked changes of updates made to the Milestone Reference List since publication of PIR V1.0 in March 2024.

Milestone #	Milestone Name	Milestone Dependencies	Milestone Owner	Milestone Target Quarter	Milestone Target Date	Status
FASS.01	Establish The Project Panel	-	RAs	Jan - Mar 2024	February 2024	Complete
FASS.02	SEMC Decision on Phased Implementation Roadmap	-	SEMC	Jan - Mar 2024	February 2024	Complete
FASS.03	Commence IT Systems Procurement	FASS.02	TSOs	Jan - Mar 2024	February 2024	Complete
FASS.04	Publish Phased Implementation Roadmap 1	FASS.02	TSOs	Jan - Mar 2024	March 2024	Complete
FASS.05	Publish FASS Daily Auction/Procurement Design Consultation Paper	FASS.04	TSOs	Jan - Mar 2024	March 2024	Complete
FASS.06	Commence Detailed Requirements	-	TSOs	Jan - Mar 2024	March 2024	Complete
FASS.07	Establish System Service Code Development Working Group Terms of Reference	FASS.04	TSOs	Apr - Jun 2024	April 2024	Complete
FASS.08	Issue List of Proposed Licence Modifications to RAs	-	TSOs	Apr - Jun 2024	November 2024	In progress
FASS.09	Publish FASS Daily Auction Product Review and Locational Methodology Consultation Paper	-	TSOs	Apr - Jun 2024	May 2024	Complete
FASS.10	FASS Programme Funding Request Approval	-	RAs	Apr - Jun 2024	June 2024	Complete
FASS.11	Publish FASS Daily Auction/Procurement Design Recommendation Paper	FASS.05	TSOs	Apr - Jun 2024	June 2024	Complete
FASS.12	SEMC Decision on FASS Daily Auction/Procurement Design	FASS.11	SEMC	Jul - Sep 2024	July 2024	Complete
FASS.13	Publish Annual Layered Procurement Assessment Recommendations Paper 2024	-	TSOs	Jul - Sep 2024	July 2024	Closed*
FASS.14	Publish FASS Daily Auction Product Review and Locational Methodology Recommendation Paper	FASS.09	TSOs	Jul - Sep 2024	August 2024	Closed*
FASS.15	Commence Grid Code Review	FASS.14	TSOs	Jul - Sep 2024	September 2024	Mobilising
FASS.16	Publish Phased Implementation Roadmap 2	FASS.04	TSOs	Jul - Sep 2024	September 2024	Complete

Milestone #	Milestone Name	Milestone Dependencies	Milestone Owner	Milestone Target Quarter	Milestone Target Date	Status
FASS.17	SEMC Decision on FASS Daily Auction Product Review and Locational Methodology	FASS.14	SEMC	Oct - Dec 2024	October 2024	In Progress
FASS.18	SEMC Decision on Annual Layered Procurement Assessment 2024 (if required)	FASS.13	SEMC	Jul - Sep 2024	September 2024	TBC (if required)
FASS.19	Issue System Services Charge Recommendations Paper	-	TSOs	Oct - Dec 2024	November 2024	In Progress
FASS.20	Publish High Level Readiness Scope	FASS.12	TSOs	Oct - Dec 2024	November 2024	Not Started
FASS.21	Issue Volume Forecasting Methodology Recommendation Paper including Volumes Requirements Reporting	FASS.17	TSOs	Oct - Dec 2024	December 2024	Not Started
FASS.22	Draft Plain English Version of SS Code - Frist Draft	FASS.07 FASS.12 FASS.17 FASS.18	TSOs	Jan - Mar 2025	January 2025	In Progress
FASS.23	Commence Analysis of options for Non-Reserve Procurement, including LPF	-	TSOs	Oct - Dec 2024	October 2024	New
FASS.24	Mobilise Real Time Security Arrangements workstream (FAM Alternatives)	FASS.12	RAs & TSOs	Oct - Dec 2024	October 2024	New
FASS.25	Share suggested approach to TSO licence modifications		TSOs	Oct - Dec 2024	November 2024	In Progress
FASS.26	RAs agreement on Analysis of options for Non- Reserve Procurement, including LPF	FASS.23	RAs	Jan - Mar 2025	January 2025	New
FASS.27	SEMC Decision on System Services Charge	FASS.19	SEMC	Jan - Mar 2025	January 2025	New
FASS.28	Publish Parameters and Scalars Consultation Paper	FASS.12 FASS.17	TSOs	Dec - Feb 2025	February 2025	New
FASS.29	SEMC Decision on DS3 SS Tariffs to DASSA	FASS.12	SEMC	Jan - Mar 2025	February 2025	New
FASS.30	SEMC Decision on Volume Forecasting Methodology including Volumes Requirements Reporting	FASS.21	SEMC	Jan - Mar 2025	February 2025	New

Milestone #	Milestone Name	Milestone Dependencies	Milestone Owner	Milestone Target Quarter	Milestone Target Date	Status
FASS.31	Publish Phased Implementation Roadmap V3.0	-	TSOs	Jan - Mar 2025	March 2025	New
FASS.32	Commence DASSA System Implementation**	-	TSOs	Jan - Mar 2025	March 2025	New
FASS.33	Issue Real Time Security Arrangements (FAM Alternatives) Recommendation Paper	FASS.24	TSOs	Jan - Mar 2025	March 2025	New
FASS.34	Publish Non-Reserve Procurement, Products, Volumes & Locations Consultation Paper***	FASS.26	TSOs	Apr - Jun 2025	April 2025	New
FASS.35	SEMC Decision on Real Time Security Arrangements (FAM Alternatives)	FASS.32	SEMC	Apr - Jun 2025	April 2025	New
FASS.36	Issue Parameters and Scalars Recommendations Paper	FASS.28	TSOs	Apr - Jun 2025	May 2025	New
FASS.37	SEMC Decision on Parameters and Scalars	FASS.36	SEMC	Apr - Jun 2025	June 2025	New
FASS.38	Issue Annual Layered Procurement Assessment Recommendations Paper 2025	-	TSOs	Apr - Jun 2025	June 2025	New
FASS.39	Draft Plain English Version of SS Code - Second Draft	FASS.22 FASS.27 FASS.29 FASS.30 FASS.35 FASS.37	TSOs	Apr - Jun 2025	June 2025	New
FASS.40	Complete preparation for RAs Consultation on Licence Modifications	-	RAs	Apr - Jun 2025	June 2025	New
FASS.41	Publish Engagement & Market Readiness Approach	FASS.20	TSOs	Apr - Jun 2025	June 2025	New

#### Notes:

- \*Pending further engagement and / or publication to SONI / EirGrid websites
- \*\*Further clarity by way of IT implementation timelines to be detailed in PIR V3.0 post vendor onboard expected early 2025.
- \*\*\*In the interest of efficiencies and accounting for feedback received, the TSOs will endeavour to deliver the procurement, product and volume forecasting design for non-reserve products as a single consultation and recommendation paper. The TSOs reserve the right however to review this approach should it be required.