

SEMOPX MODIFICATION PROPOSAL FORM			
Proposer (Company)	Date of receipt (assigned by Secretariat)	Type of Proposal (delete as appropriate)	Modification Proposal ID (assigned by Secretariat)
SEMOpX	24 th October 2024	Standard	SPX_03_24
Contact Details for Modification Proposal Originator			
Name	Telephone number	Email address	
Amy Yeung		Amy.Yeung@Eirgrid.com	
Modification Proposal Title			
Multiple Auction Trading System (MATS) Implementation			
Documents affected (delete as appropriate)	Section(s) Affected	Version number of SEMOpX Rules or Operating Procedure used in Drafting	
SEMOpX Operating Procedures SEMOpX Operating Procedures Glossary SEMOpX Rules Glossary	SEMOpX Operating Procedures: A.3.1.2, B.1.3.5, C.1.3.5, B.1.3.6, C.1.3.6, B.4.2.1, C.4.2.1, Schedule A.1, A.3 & A.6 SEMOpX Operating Procedures Glossary: A-L & M-R SEMOpX Rules Glossary: S-Z	Version 8.0	
Explanation of Proposed Change (mandatory by originator)			
<p>This modification proposes to update the SEMOpX Operating Procedures, SEMOpX Operating Procedures Glossary and SEMOpX Rules Glossary to reflect the implementation of the new Multiple Auction Trading System (MATS) to replace the existing EPEX SPOT Trading System (ETS). No changes are required to the SEMOpX Rules.</p> <p>The new MATS trading system is a requirement of 30 Min MTU implementation as the Local Market Trials and SDAC Member Testing will be conducted in the new MATS simulation environment. The changes are scheduled to go-live in late Q1-Q2 2025.</p> <p>Note: the changes do not affect the Intraday Continuous Trading System (M7).</p> <p>The key updates required due to MATS are:</p> <ol style="list-style-type: none"> 1) A single trading limit for auctions in either EUR or GBP, but not both. 2) Introduction of options for piecewise and hybrid curves submission for Simple Orders 3) References to ETS removed or changed to MATS 4) Market Results price increment publication to 2 decimal places not 3. <p>These key updates are detailed below:</p> <p><u>SEMOpX Operating Procedures:</u></p> <p>Section A.3.1.2 includes the replacement of the text “may” with the text “shall” after the text “Market Segments”. Section A.3.1.2 also includes the removal of “or both of” in front of the text “Euro” and the</p>			

replacement of the text “and” to read “or” in front of the text “Pounds Sterling”. This reflects the change to allow only 1 trading limit, in either EUR or GBP, per settlement member.

Sections B.1.3.5 and C.1.3.5 include the replacement of the text “step-wise” with the text “stepwise curve or a piecewise curve or a Hybrid Curve” after the text “PQ Pairs in a Simple Order are to represent a”. This reflects the new functions offered as part of the new trading system Simple Order submissions. It is the member’s choice which curve is used during the Simple Order submission.

New sections are included to define the Prices specified in relation to either a Simple Order of a stepwise curve or a piecewise curve or Hybrid Curve function. The following sections were amended with new and additional text:

- B.1.3.6 (a), (b), (c), (d), (e) and (f)
- C.1.3.6 (a), (b), (c), (d), (e) and (f)

Sections B.4.2.1, C.4.2.1 and Appendix A: Schedule A.6 include the removal of the text “ETS”.

Appendix A: Schedule A.1 and Schedule A.3 include amendments to the “Price Increment” section which replace the text “three” with the text “two” in front of the text “decimal places”. This reflects the change from 3 decimal places to 2 decimal places in the publication of prices in the Market Results. The number of decimal places used in the calculation of the prices and in settlement remains unaffected by this change.

SEMOpx Operating Procedures Glossary:

Delete definition for “ETS – means the EPEX Spot trading system”.
Add new definition for “MATS – means the Multiple Auction Trading System”.
Add new definition for “Hybrid Curve – means a Simple Order curve containing both stepwise and piecewise functions with the characteristics described in B.1.3 and C.1.3.” added

SEMOpx Rules Glossary:

Under “SEMOpx Trading Systems (or Trading Systems)”, replace the text “ETS” with the text “MATS”.

Legal Drafting Change
*(Clearly show proposed change to SEMOpx Rules (including Appendices and Operating Procedures) using **tracked** changes, if proposer fails to identify changes, please indicate best estimate of potential changes)*

The sections of the document with changes tracked as shown in the below embedded SEMOpx Operating Procedures, SEMOpx Operating Procedures Glossary and SEMOpx Rules Glossary:



SEMOpx-Rules-Glossary (MATS).docx



SEMOpx Operating Procedure (MATS) v1



SEMOpx-Operating-Procedures-Glossary (MATS) v1

Modification Proposal Justification
(Clearly state the reason for the Modification)

This modification seeks to amend the SEMOpx Operating Procedures to reflect the changes from the implementation of the Multiple Auction Trading System (MATS) to replace the EPEX SPOT Trading System (ETS). The need for a new trading system is due to the increasing API usage by members and higher levels of product complexity being introduced in the Single Day-Ahead Coupling (SDAC) and Single Intraday Coupling (SIDC) including Cross-Product Matching, trading in multiple Market Time Units (MTU), and the introduction of new complex products. The new MATS platform will provide future-proofing and scalability when SEMOpx is re-coupled with SDAC and SIDC via the Celtic Interconnector. Additional benefits include a web-based application with API push mechanism, bulk data imports, a modern user interface, and lighter deployments of new releases

which will add value to members' overall user experience. To facilitate the Day-Ahead Market (DAM) 30 Minute MTU member testing which is a requirement for SEMOpx to comply with Article 8 of the Clean Energy Package (CEP), the Market Trials and SDAC Member Testing will be completed using the MATS platform.

SEMOpx Objective and SEMOpx Principles Furthered

(State the SEMOpx Objective and Principles the Proposal furthers, see Section A.1.2 of the SEMOpx Rules for further details)

The principles of the SEMOpx rules are:

A.1.2.1 *These SEMOpx Rules are designed to facilitate achievement of the following objective (the "SEMOpx Objective"):*

- (a) *That participation and trading in commercially viable and sustainable product offerings in the SEMOpx day-ahead and intraday markets meets the needs of current and prospective Exchange Members, and promotes the long-term interests of consumers.*

A.1.2.2 *The SEMOpx Objective is supported by the following principles: that the SEMOpx Rules should:*

- (a) *enable compliance with the regulatory requirements of the European Union, Ireland and Northern Ireland;*
- (b) ***promote competitive outcomes through provision of efficient and effective exchange services;***
- (c) *conform with regional and European-wide arrangements for Market Coupling;*
- (d) *be transparent, not unduly discriminatory, and promote market integrity and confidence;*
- (e) ***reflect the system design and capabilities and service provider arrangements;***
- (f) *provide Exchange Members with opportunities to be consulted on changes to SEMOpx Rules and Procedures; and*
- (g) *promote data security, integrity and confidentiality, being the "SEMOpx Principles".*

This modification proposal furthers the SEMOpx Principles (b), and (e), above by ensuring:

- The SEMOpx Operating Procedures align with the implementation of a new Hybrid Curve and piecewise function as part of the new Simple Order offerings, whilst maintaining the existing Simple Order stepwise curve function.
- The SEMOpx Operating Procedures accurately reflect the setup and capabilities of the new SEMOpx trading system (MATS) to process market bid/offer data submitted and receive market results at the intended MTU across all auctions.

Implication of not implementing the Modification Proposal

(State the possible outcomes should the Modification Proposal not be implemented)

With the need to move to a more robust trading system that can handle the anticipated increase in API usage, higher levels of complex product matching and multiple market time units, it was determined that a new trading system MATS would be more suitable than the current trading system ETS. The current MATS implementation plan includes the decommissioning of ETS after an agreed period of time (to be determined) after MATS go-live. If this modification proposal is not implemented, there will not be a trading system to facilitate the Day-Ahead Market 30-Minute MTU Market Trial and SDAC Member Testing and after DAM 30-minute MTU go-live, SEMOpx members will be left with no trading system to trade on.

Impacts

(Indicate the impacts on systems, resources, processes and/or procedures; also indicate impacts on any other Market Code such as Trading and Settlement Code, Capacity Market Code, Grid Code, Exchange Rules etc.)

- The SEMOpx Operating Procedures, SEMOpx Operating Procedures Glossary and SEMOpx Rules Glossary require an update (this modification). There is no foreseen update to the associated SEMOpx Rules.
- SEMOpx will need to update and test market systems, production market systems, service provider systems and interfaces that relate to the DAM and IDA auctions.
- SEMOpx will need to participate in bilateral testing with EPEX.
- SEMOpx internal training materials and procedural documentation will need to be updated to include references to MATS to replace ETS.
- SEMOpx will need to update member training materials and SEMOpx website content.
- SEMOpx will need to update live member publications such as Trading on Behalf submission templates, SEMOpx Data Publication Guide to reflect the MATS changes.
- SEMOpx will need to publish any new Trader Client Guides, Technical Specification package and API packages to the SEMOpx Website to allow members to make changes to their systems.
- SEMOpx will provide members with webinar and training sessions
- SEMOpx will migrate all members from ETS to MATS
- SEMOpx Members will need to test and update their systems as a result of MATS implementation.
- SEMOpx Members will need to train their staff on using the new MATS platform.
- SEMOpx Members will need to ensure business processes and procedures are updated as a result of MATS implementation.
- SEMOpx Members are recommended to participate in 30Min MTU Market Trials and SDAC Member Testing.
- SEMOpx Members must complete API Conformance Testing prior to Go-live of MATS.

Please return this form to Secretariat by email to exchangecommittee@semopx.com

Notes on completing Modification Proposal Form:

1. If a person submits a Modification Proposal on behalf of another person, that person who proposes the material of the change should be identified on the Modification Proposal Form as the Modification Proposal Originator.
2. Any person raising a Modification Proposal shall ensure that their proposal is clear and substantiated with the appropriate detail including the way in which it furthers the SEMOpX Objective and Principles to enable it to be fully considered by the Exchange Committee.
3. Each Modification Proposal will include a draft text of the proposed Modification to the SEMOpX Rules.
4. For the purposes of this Modification Proposal Form, the following terms shall have the following meanings:

Modification Proposal: means the proposal to modify the SEMOpX Rules and / or Operating Procedures as set out in the attached form

Derivative Work: means any text or work which incorporates or contains all or part of the Modification Proposal or any adaptation, abridgement, expansion or other modification of the Modification Proposal

SEMOpX: has the meaning assigned to it in the glossary to the SEMOpX Rules

SEMOpX Rules: means the rules, including the Appendices and Procedures, as amended from time to time or otherwise modified in accordance with those SEMOpX rules.

SEMOpX Exchange Committee or "the Exchange Committee": has the meaning assigned to it in SEMOpX Rules.

Regulatory Authorities: has the meaning assigned to it in the SEMOpX Rules.

In consideration for the right to submit, and have the Modification Proposal assessed in accordance with the SEMOpX Rules and Exchange Committee Procedures which I have read and understand, I agree as follows:

1. I hereby grant a worldwide, perpetual, royalty-free, non-exclusive licence:
 - 1.1 to the SEMOpX and the Regulatory Authorities to publish and/or distribute the Modification Proposal for free and unrestricted access;
 - 1.2 to the Regulatory Authorities, the SEMOpX Exchange Committee and each member of the Exchange Committee to amend, adapt, combine, abridge, expand or otherwise modify the Modification Proposal at their sole discretion for the purpose of developing the Modification Proposal in accordance with the SEMOpX Rules;
 - 1.3 to SEMOpX and the Regulatory Authorities to incorporate the Modification Proposal into the SEMOpX Rules;
 - 1.4 to all Parties to the SEMOpX Rules and the Regulatory Authorities to use, reproduce and distribute the Modification Proposal, whether as part of the SEMOpX Rules or otherwise, for any purpose arising out of or in connection with the SEMOpX Rules.
2. The licences set out in clause 1 shall equally apply to any Derivative Works.
3. I hereby waive in favour of the Parties to the SEMOpX Rules and the Regulatory Authorities any and all moral rights I may have arising out of or in connection with the Modification Proposal or any Derivative Works.
4. I hereby warrant that, except where expressly indicated otherwise, I am the owner of the copyright and any other intellectual property and proprietary rights in the Modification Proposal and, where not the owner, I have the requisite permissions to grant the rights set out in this form.
5. I hereby acknowledge that the Modification Proposal may be not be supported by the Exchange Committee, may be rejected by SEMOpX and / or the Regulatory Authorities and that there is no guarantee that my Modification Proposal will be incorporated into the SEMOpX Rules.