



Commission for Energy Regulation
The Exchange,
Belgard Square North,
Tallaght,
Dublin 24

10th February 2014

By email: rorourke@cer.ie;
Cc pbrandon@cer.ie; brian.mulhern@uregni.gov.uk;

Re: Latest Analysis of RoCoF Proposal

Dear Robert,

On behalf of the members of the EAI I write to thank you for meeting with us on the 29th of January and to summarise our concerns in relation to the RoCoF proposal most notably in relation to the technical feasibility of moving to 1Hz/s.

Our analysis of the data from the KEMA study commissioned by Eirgrid highlighted scenarios where both plant integrity and human safety may be compromised. Indeed one of these scenarios, operating at leading power factor, is common for most generators during night time operation. A more recent KEMA study, commissioned by ESB GWM, found similar issues when generators are operating at minimum levels of generation. Again, this is a common operating scenario for most generators. These factors highlight the fact that it has not been adequately demonstrated if the proposed Code Mod to increase RoCoF to 1 Hz/sec is technically feasible and that it is prudent to examine other solutions to increase SNSP.

Indeed, providing more information on alternative solutions is just one of a number of recommendations made by the PPA Energy study. EAI reiterates its request that either these recommendations are actioned or a reasoned justification as to why they are being rejected is provided before any decision on the Code Mod is made.

Also highlighted during our meeting were the issues regarding the studies to be carried out by the OEMs. All OEMs who have provided scopes of work have highlighted the need for either a suitable frequency trace or a full (or reduced) dynamic system model. To date Eirgrid have been unable to provide what the OEMs consider to be the relevant traces. Regarding the timeframe for the studies most OEMs that have engaged and that have provided scopes of work have indicated timeframes of between 12 and 18 months to perform these studies. More importantly these OEMs have stated that they only have the resources to assess one plant at a time. Based on this the timelines proposed by the CER are highly unrealistic.



It was previously proposed by CER that Eirgrid would project-manage the overall project. EAI strongly feels that it is inappropriate for Eirgrid to fulfill this role. Eirgrid operate the transmission system and they do not own or operate generation plant. Hence, they do not have adequate knowledge or understanding of the mechanical and safety issues associated with a generation plant nor do they give it the relevant attention or weighting in their analysis. This is reflected by the additional research that has been presented by EAI on the technical feasibility issues that generators might face. As such EAI feels that Eirgrid may not be able to provide a full and reasoned analysis of the impact on all of the contributors to the solution.

Finally, EAI would like to highlight to the CER the importance of cost recovery. As outlined above the studies are essential to assess the possibility of changing the standard. However, imposing the cost of these studies on the conventional generators without any mechanism for cost recovery is both unreasonable and counterproductive.

In coming to a final decision EAI hope that CER will bear in mind these key issues.

Kind Regards,

A handwritten signature in black ink, appearing to read 'Step Douglas', is written in a cursive style.

Stephen Douglas
Senior Advisor
Electricity Association of Ireland (EAI)