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Robert O'Rourke  
Commission for Energy Regulation  
The Exchange  
Belgard Square North  
Tallaght  
Dublin 24

12<sup>th</sup> August, 2013

Dear Robert,

This letter summarises the EirGrid Response to CER Consultation Paper CER/13/143 on Rate of Change of Frequency Modification to the Grid Code.

EirGrid and SONI (the TSOs) welcome the publication by the CER of the consultation paper on Rate of Change of Frequency (RoCoF) and the TSOs' proposed modification to the Grid Codes, and believe that it accurately summarises the position of the TSOs as well as the positions of other parties (generators and DSOs).

The CER proposal to approve the modification in principle is welcome. However it is noted that the proposal to allow an extended period of time for generators to confirm their ability to ride through high RoCoF events, is likely to delay the implementation of policy changes. This will put pressure on meeting the RES-E policy objectives and trajectory for the 2020 targets. It is important that the time afforded to generators to confirm compliance is no longer than is reasonably necessary.

The TSOs welcome the project governance proposals set out in the CER's paper, and illustrated in the appendix and the support shown for TSO/DSO RoCoF co-operation. However the arrangements for the governance of the Generators' Implementation Projects merits further consideration and clarification. While the TSOs are, as noted, best placed to assess overall system security requirements, the generators have the best knowledge of their plant and ultimately have the obligation to ensure it is Grid Code compliant. The importance of this principle should not be under estimated. A possible project management arrangement might include:



**Directors:** Bernie Gray, Chairperson, Fintan Slye, Chief Executive, Doireann Barry, Dr Gary Healy, Martina Moloney, Regina Moran, Liam O'Halloran, Bride Rosney, Dr Joan Smyth, Richard Sterling

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- Each Generator sets out its plan (and timeline) to assess and confirm compliance of its plant to the TSO in accordance with the CER's decision;
- The TSO provides its comments and input into the Generator's plan to ensure the approach addresses identified concerns of both the generators and the TSO;
- Areas lacking agreement, if any, are adjudicated by CER;
- The Generators are required to provide updates periodically as to progress against their plan;
- The TSO aggregates the information and reports to CER on overall progress and on any issues arising.

The TSOs will investigate what would be involved in an "alternative solutions" project to investigate ways of operating the power system at higher SNSP values than 50%, while either maintaining the current RoCoF standard, or operating with only a partial fleet of generators that are compliant with a higher (+/- 1Hz/s) RoCoF standard. The TSOs will discuss the scope of the project with the industry and with the CER.

Once the scope of the studies is completed, the TSOs will be in a position to estimate the timeline and resource requirements for completion of the work, and will advise the CER of such once known. Where additional costs are identified it is expected that these will be recovered via the annual Revenue Adjustment process.

On the issue of generator study costs, the TSOs do not have a formal position. With regard to Generator Performance Incentives, the TSOs believe that GPIs are not necessarily the only or the most appropriate way of giving effect to the required RoCoF changes, and that this proposal merits further consideration.

The TSOs agree with the CER's consultants, PPA Energy, when they stress that generators must not be allowed install RoCoF protection to trip off plant at a level less than required by the Grid Code, as this could exacerbate system instability during a high RoCoF event. This principle should be explicitly captured in the Grid Code and the TSO suggests that the CER might direct the TSO to bring forward a modification in this respect. As this principle would also extend to distribution-connected plant the TSO will need to work closely with the DSO as already outlined in the proposal to ensure that it is pragmatically implemented.

Given the impacts this decision has for the all island power system the TSO would propose, following appropriate decisions in each jurisdiction, a meeting with the Regulator Authorities to discuss and agree the overarching plan and modus operandi of the project.

Yours sincerely

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Jonathan O'Sullivan  
Manager, Sustainable Power Systems  
EirGrid

