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

Our Ref:

12 July 2013

Dear Mr O'Rourke,

**Re: RES Consultation Response - Rate of Change of Frequency (ROCOF) Modification to the Grid Code**

Through its subsidiary RES UK & Ireland, RES has been developing wind projects on the island of Ireland since the early 1990s, having developed 14 operating wind farms in Northern Ireland and 4 operating wind farms in the Republic of Ireland, totalling 241MW. RES currently owns or operates 134MW of wind capacity across the island. In addition, RES has 62MW of wind capacity in development with planning consent in Northern Ireland and a further 55MW of new wind generation currently in the planning system. RES has been an established presence at the forefront of the wind energy industry for over three decades. Our core activity is the development, design, construction, financing and operation of wind farm projects worldwide. With a portfolio of almost 7.0GW constructed and several gigawatts under construction and in development, RES continues to play a leading role in what is now the world's fastest growing energy sector.

RES has been an active participant in the DS3 process and welcomes the opportunity to respond to this consultation.

Here are RES' answers to the CER's consultation questions:

*1. Do you agree with the CER's proposal to approve MPID 229 in principle?*

Yes. Approval of MPID 229 is necessary to allow Ireland and Northern Ireland to meet their renewable energy targets and to achieve the consequent benefits of improved fuel security, fuel cost reductions, employment and climate change mitigation.

*2. Do you agree with the conditions for giving MPID 229 effect in the Grid Code?*

Yes.

*3. Do you agree with the proposal to establish an implementation project to co-ordinate the activities of generators and system operators?*

Yes.

4. *Do you agree with the proposed high level governance structure?*

Yes.

5. *Do consider that the costs for the technical studies should be recoverable?*

No. Cost recovery would be unprecedented.

6. *Do you agree with the proposed introduction of a GPI for ROCOF*

Yes. This should help incentivise timely completion of the project and limit the delay already incurred in raising the SNSP limit. Raising this limit is necessary to allow Ireland and Northern Ireland to meet their renewable energy targets and to achieve the consequent benefits of improved fuel security, fuel cost reductions, employment and climate change mitigation.

7. *Do you agree with the proposal to require EirGrid to explore and implement alternative solutions?*

Yes. This is necessary to mitigate the MPID 229 implementation risks identified by the CER in your consultation report.

8. *Are there any other issues you wish to raise?*

Yes.

- a. It is not clear to whom Eirgrid will provide the proposed monthly status reports. These should be published on the Eirgrid web site and should be available to the CER, the Grid Code Review Panel and the DS3 Working Group / Advisory Council.
- b. The content of the proposed Eirgrid monthly status reports is not specified. They should contain:
  - Details of overall project status vs key milestones
  - Details of project key task status vs key milestones
  - Details of named individual generators' progress vs key milestones
  - project completion date, original and revised.
  - individual generators' completion dates, original and revised.
  - Proposals to reduce actual or anticipated delay in any of the above.
  - Percentage of required generator ROCOF security achieved to date.

I hope that you find the comments contained in this response helpful. If you wish to discuss them, please do not hesitate to contact me.

Yours sincerely,

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