



Brian Mulhern / Karen Shiels  
Utility Regulator  
Queens House  
14 Queen Street  
Belfast  
BT1 6ED

27 September 2013

*[By email only]*

**Rate of Change of Frequency Modification to the Grid Code – Utility Regulator Proposed Decision**

Dear Brian and Karen

I refer to above proposed decision and wish to endorse on behalf of Energia the response submitted by the Electricity Association of Ireland (EAI) which contained the following key points:

- EAI fully supports delivery of the two governments' ambitious renewables targets and is committed to full engagement in the DS3 process.
- A reasoned justification of the rejection of the PPA recommendations is required.
- A Utility Regulator (UR) decision providing cost recovery of mandatory studies under this retrospective proposal is required.
- The proposed timeline is unrealistic.
- In line with the above, EAI contends that the Code Modification cannot be approved or rejected at this time.
- If a ROCOF GPI is adopted despite the concerns raised in this response, EAI calls on the respective regulatory authorities to bring this to the SEM Committee for careful consideration and a separate SEM Committee consultation in the context of the harmonised Other System Charges regime.

Energia submitted a detailed response to the Commission for Energy Regulation (CER) outlining our concerns with their proposals on ROCOF. We would have equivalent concerns with the UR proposals.

Yours sincerely

A handwritten signature in blue ink that reads "K Hannafin".

Kevin Hannafin  
Regulation Manager