



The Innovation Centre
Northern Ireland Science Park
Queen's Road
Belfast
BT3 9DT

T 028 9073 7751
F 028 9073 7752
E info@ipower.uk.com
W www.ipower.uk.com

Brian Mulhern/Karen Shiels
Electricity Directorate
Queens House
14 Queen Street
Belfast BT1 6ED

September 27th 2013

Dear Brian/Karen

CONSULTATION RESPONSE – ROCOF MODIFICATION TO THE GRID CODE

iPower welcome the opportunity to respond to the URegNI consultation on the RoCoF Modification to the Grid Code. We understand the importance of the DS3 project and continue to be supportive of the efforts across the industry in delivering the government targets.

Like conventional generators iPower continue to have concerns around the impact that higher levels of RoCoF will have on the individual generators that comprise our AGU. We will seek assistance from the respective OEMs in providing the necessary impact assessment, including costings, for such assessment and associated adjustments as might be required.

At a general level we believe that the proposed RoCoF Grid Code Mod is very premature and that there is an enormous amount of work to be done before proceeding to make changes to the Grid Code. We believe that if an imperative exists it must be in proceeding with the assessments of the impact on conventional generators that have been identified across the board as being very necessary.

In particular we note the many recommendations in the PPA report of May 2013 commissioned by CER which highlight the many areas that need to be addressed and which we feel must be addressed before moving to implement changes to the Grid Code.

We are also of the view that the costs associated with impact assessments on conventional generators and any upgrade works that are required to facilitate the new order should not be borne by each individual generator but must be recoverable from elsewhere across the market. There are a number of suggestions by way of recovery mechanism that have been proposed by ESBPG on this which are valid.

iPower

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