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

Our Ref: EN01-003990

29 August 2013

Dear Mr Mulhern & Ms Shiels,

Re: RES Response to Utility Regulator Proposed Decision on Rate of Change of Frequency Modification to the SONI 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 Northern Ireland 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 7GW 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 has an active role in the SONI Grid Code Review Panel. We welcome the opportunity to respond to this Proposed Decision.

RES agrees with the background described in the Utility Regulator's (UR's) proposed decision document except in section 1.7 where it says *"If no changes were made on the distribution system a high RoCoF event could result in large parts of the distribution system tripping unnecessarily creating a cascade effect across the entire transmission network"*. It would be more accurate to say *"If no changes were made to the 'anti-island' or 'loss of mains' protection of generators embedded in the distribution system, a high RoCoF event could result in many such embedded generators tripping unnecessarily creating a cascade effect across the entire transmission network"*. This amended description does not materially affect the UR's proposed decision but does emphasise the importance of NIE's work to investigate suitable protection arrangements for such generators so as to avoid balancing risks to the whole system.

RES agrees with the UR's proposed decision. In particular, a Generator Performance Incentive would be a useful tool to help ensure that compliance is achieved within the proposed timescale. As an additional tool to this end, in a similar manner to the proposal that Eirgrid should monitor and report on progress towards achieving widespread generator compliance with the proposed ROCOF requirements in the Republic of Ireland, RES suggests that SONI should monitor and report on the same matters in Northern Ireland. Such

reports should be published on the SONI web site and should be available to the UR, the Grid Code Review Panel and the DS3 Working Group / Advisory Council. The progress reports 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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