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Brian Mulhern
Electricity Directorate
NIAUR
Queen's House
14 Queen St
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27th September 2013

Dear Brian,

This letter summarises the SONI Response to the Utility Regulator Proposed Decision on Rate of Change of Frequency Modification to the Grid Code.

SONI and EirGrid (the TSOs) welcome the publication by the Utility Regulator of the proposed decision 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 Utility Regulator proposal to approve the modification in principle is welcome as is the proposal that the impact up to 2Hz/s be studied. 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 note that no proposal has been made for governance of the implementation projects of the generators nor have they expressed a view on cost recovery. However the TSOs assume that these will be agreed with CER so that an all-island approach can be taken. 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. We

would therefore disagree with the last line of section 1.4 that “The TSOs shall ensure that compliance with a higher RoCoF is achieved.”

A possible project management arrangement might include:

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

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 Utility Regulator of such once known. Where additional costs are identified it is expected that these will be recovered via the annual Revenue Adjustment process. We can of course discuss these issues further when CER and NIAUR have concluded the consultation.

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 GPs 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.

Given the impacts this decision has for the all island power system SONI 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



Brendan Woods
Manager, Nertime Operations
SONI