

Approved Minutes of the Joint Grid Code Review Panel (JGCRP)

24 September 2024

Member Attendance:

Constituent	Member	Attendance	Panel
Chair	Miriam Ryan	Y	EirGrid
TSO			EirGrid
TSO	Melissa Dunne	Y	EirGrid
TSO	Michael Coone	Y	EirGrid
CCGT	Mark Lucas Oliver Caherty	Y	EirGrid
Thermal Generators	Jennifer Geraghty	N	EirGrid
Thermal Generators	Michael McCormack	Y	EirGrid
Fast Acting Peaking Generators	Mostafa Bakhtvar	Y	EirGrid
Synchronous Renewable Generators	Open Position		EirGrid
Pumped Storage Generators (PSG)	Paraic Higgins	Y	EirGrid
Non-Synchronous Renewable Generators	Peter King	Y	EirGrid
Non-Synchronous Renewable Generators	Kevin Moran	N	EirGrid
	Thomas O'Sullivan Gavin McClean	Y	EirGrid
Demand Customers			
Demand Side Units (DSU)	Paul Troughton	Y	EirGrid
Demand Side Units (DSU)	Vlastik Buzek	Y	EirGrid
Energy Storage Units (ESPS)	Tom Birney	Y	EirGrid
	Tony Hearne John Whelen	Y	EirGrid
Distribution System Operator (DSO)			
Public Electricity Supplier (PES)	Mark Phelan	Y	EirGrid
Independent Electricity Suppliers	Open Position		EirGrid
			EirGrid
CRU	Payal Soni	Y	
	Cormac Fitzpatrick Jessica Hutton	N	EirGrid
Transmission Asset Owner Licensee (TAO)			
Market Operator (MO)	Sorcha Dineen	Y	EirGrid
Other TSO			
	Niamh Daly Jonathan Ruddy	Y	EirGrid
	Daniel Moloney Hariram Subramanian	Y	EirGrid
Solar Generators			
Offshore Non-Synchronous Generators	TBC		EirGrid
Synchronous Condenser Units (SCU)	Cahir O'Neill	Y	EirGrid

Other Attendees:

Name	Present	Role	Panel
Arlene Chawke	Y	TSO Secretary	EirGrid
Aideen O'Hagan	Y	Observer	EirGrid

Simon Tweed	Y	Presenter from EirGrid	EirGrid
Deirdre Hughes	Y	Presenter from EirGrid	EirGrid
Saif Aldahmor	Y	Presenter from EirGrid	EirGrid
Ciaran Maguire	Y	Presenter from EirGrid	EirGrid
Patrick Liddy	Y	Observer from DRAI	EirGrid
Athar Khan	Y	Observer from EirGrid	EirGrid
Treisa Sahaya	Y	Observer from Future Operations	EirGrid
Lewis Ngari	Y	Presenter from CRU	EirGrid

SONI GCRP Members:

Attendance: Name	Present	Role
Sam Matthews (SM)	Y	SONI GCRP Chairperson- Alternate
Finian Hagan (FH)	Y	SONI GCRP Secretary- Alternate
Brian Mongan (BM)	N	Aggregator Member
Stephen Hemphill (SH)	N	Interconnector Owners
Sam Gibson (SG)	Y	Interconnector Owners Alternate
Stephen Brownlees (SB)	N	Generators
Damian O'Neill (DON)	N	Generators
Jody O'Boyle (JO)	Y	Utility Regulator (UR)
Ben Harris (BH)	Y	Utility Regulator Alternate
Tola Laly (TL)	Y	Utility Regulator Observer
Niall Maguire (NM)	Y	RES- Large Scale
Andy McCrea (AMC)	N	RES- Large Scale Alternate
William Deane (WD)	N	RES – Small Scale
Krishna Anaparthi (KA)	N	Electricity Storage
Jim Cooke (JC)	N	Generators
Andrew Cupples (AC)	N	NIE Networks
Alan Kennedy (AK)	N	SONI GCRP Chairperson
Sarah Friedel (SF)	Y	TSO- Member
James McGrann (JM)	Y	Market Operator- Member
Jake Loftus (JL)	N	SONI GCRP Secretary
Michael Bambrick (MB)	Y	Aggregator Alternate

1. Introduction to JGCRP Meeting & Approval of Minutes

- a) Sam Matthews (SONI GCRP – Chairperson) welcomed all members, observers, and presenters to the meeting.
- b) No comments were received to the previous minutes and the minutes were deemed approved. The actions recorded at the previous meeting were deemed complete. The actions are being addressed in the proposed modifications.

2. Discussion on ESPS Phase 2 (MPID 318 and SPID_03_2024)

- a) Melissa Dunne (TSO Member - EirGrid) provided an update on the revised modification to incorporate ESPS Phase 2.

- b) Tom Birney (Energy Storage Units - EirGrid) added that the revised proposed modification makes good sense.
- c) No further comments from the members were received.
- d) Melissa Dunne (TSO Member - EirGrid) advised that a further discussion will take place at the individual GCRP meetings.

3. Discussion on MPID327 and SPID_05_2024 - DSU Notice to React

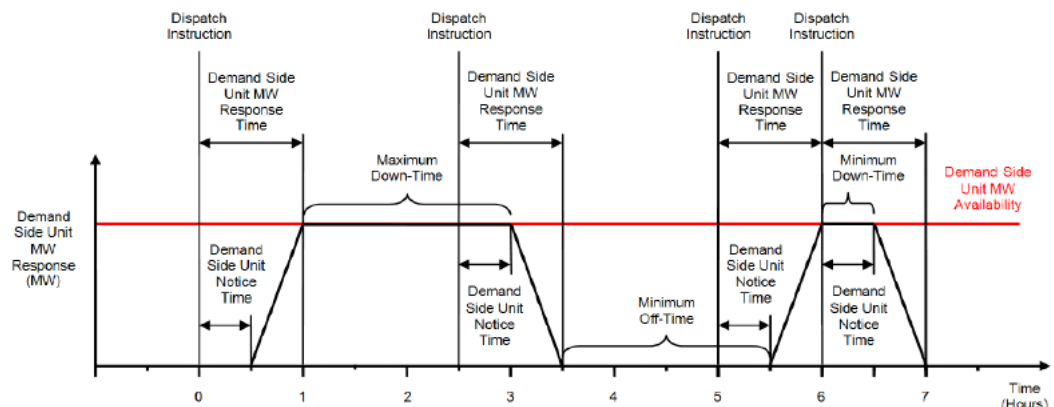
- a) Deirdre Hughes (EirGrid) presented a discussion item on the proposed modification on DSU Notice to React.
- b) Paul Troughton (DSU - EirGrid) noted his broad support for the proposed modification but pointed out an issue with a DSU providing MW response within the 15 minutes of the effective time. He recommended that the unit's response should be provided by the end of the ramp time and not within the 15 minutes i.e. provide a response by the ramp time after the effective time.
- c) Deirdre Hughes (EirGrid) further clarified that if the DSU provides any level of response it will not be part of this proposed process.
- d) Paul Troughton (DSU - EirGrid) noted that some units will respond early, and some units will respond late.
- e) Deirdre Hughes (EirGrid) explained that the Notice to React will only apply 15 minutes after the effective time and that the effective time will take account of the notice time.
- f) Vlastik Buzek (DSU - EirGrid) also addressed the issue of providing a response within 15 minutes after the effective time and recommended that full response should be provided within the ramp time i.e. response provided within the effective time plus the ramp time.
- g) An example was provided of a single site DSU, a cement manufacturer. The DSU must provide response within 45 minutes after the effective time. For production the manufacturer will sustain the load as long as they can and switch load after the 45 minutes i.e., they will provide full load until after the 45 minutes has expired. This is the issue. The DSU representatives further pointed out that this could be resolved by an aggregated unit. An aggregated unit would have the capability to provide some load and therefore would not be part of this process.
- h) The DSU representatives further noted their support for the concept of the proposed modification, but the measure is wrong. Ramp time and notice time and load time varies between max 1 hour or minutes. Most individual demand sites step change whereas an aggregated unit could provide a smoother response.
- i) Vlastik Buzek (DSU - EirGrid) further noted that the ramp time is specific to each unit and part of the TOD.
- j) Patrick Liddy (DSU Alternate – EirGrid) recommended changing the 15 minutes to the Ramp Time in the proposed definition 'Failure to Follow Notice to React Instruction'.
- k) **ACTION: The TSO will internally review the proposed modification and issue a revised modification proposal with the draft meeting minutes, 08 October. The TSO encourage members to review the revised modification and return comments by 22 October. If members do not raise any comments or concerns, the TSO will issue a recommendation paper to the CRU for decision. See the post-meeting note 1 and 2 below.**

- l) Patrick Liddy (DSU Alternate - EirGrid) If the TSO encouraged units to aggregate a smoother ramp time could be achieved.
- m) Sam Matthews (JGCRP Chairperson – SONI) agreed that on average aggregation should smooth out the ramp time but this will not always be the case.
- n) Paul Troughton (DSU - EirGrid) understood the broader point of the TSO addressing DSUs that declare themselves available but when they are given a dispatch instruction, they decide they are not available. This is bad practise that needs to be stopped. This proposed modification targets intervention on exactly that. On the other hand, Short Notice Declarations (SNDs) on DSUs are a blunt instrument that has had serious effects. Customers have stopped participating because of these charges. If the introduction of a revised modification could allow for the removal of SNDs, this would be a far greater outcome for the system.
- o) Michael Coone (TSO Member - EirGrid) disagreed with Paul, SNDs and Notice to React are trying to resolve two different issues. If the TSO cannot resolve the availability within the 1-hour response time it is impossible for the control centre to plan and run the system as economically as possible.
- p) Patrick Liddy (DSU Alternate – EirGrid) suggested that the DSU representatives meet with the TSO to discuss the specifics of SNDs.
- q) Sam Matthews (JGCRP Chairperson – SONI) recommended that there are other forums external to the GCRP to discuss these issues.

Post-Meeting Note 1:

TSO response: We would like to thank the DSU representatives for raising concerns around the operating characteristics of a DSU unit which could potentially step change rather than ramp when initially providing a response. With the introduction of this failure to react modification for DSU's, it was suggested that this behaviour would be deemed non-compliant.

Due consideration was undertaken to ensure that the modification was in line with the DSU Operational Certificates, diagram in each operational certificate is outlined below:



From the data presented at the JGCRP covering a 16-month period, the TSO subsequently reviewed the behaviour of each DSU that was dispatched on and determined 75% provided a response in line with the proposed failure to react

definition, i.e. under 15mins from its effective time subject to notice time. Of the remaining 25%, 7% failed to provide any response and 18% did not provide any response within a 15 mins of when they were expected to provide a response based on their submitted technical data and therefore would be deemed non-compliant with the Grid Code Modification (MPID327) as proposed by the TSO.”

While we understand that the technical offer data of a DSU might change in day after the submission of the units TOD set, due to an IDS making itself unavailable, this information is required to be communicated to the TSO as soon as possible as per Grid Code obligation SDC1.4.4.4 (f). The DSU has the right to dispute the application of a “Fail” instruction as per Grid Code.

For longer term non-compliance issues with a DSU’s Operational Certificate, there is several options available for consideration including derogations and proposal of grid code modifications.

Post-Meeting Note 2:

Following the 24 September JGCRP meeting, the DSU representatives emailed both the CRU and TSO regarding several items they wished to raise in relation to the proposed modification. The TSO and the DSU representatives met on two occasions (18/11/2024 and 25/11/2024) to discuss these items.

Following these discussions, the TSOs reviewed the proposed modification and have determined that the best course of action is to proceed with the Grid Code Modification, as proposed to the panel at the 24 September JGCRP meeting. On behalf of EirGrid, Miriam Ryan (Chairperson) communicated this decision to the DSU representatives on 29 November 2024, noting that the views of the DSU representatives will be recorded as part of the recommendation paper. EirGrid will provide the DSU representatives with a draft copy of the paper prior to its submission to the CRU to ensure that their views are accurately recorded.

It is noted that the SONI Grid Code Modification process requires a public consultation, and this will provide the members with an opportunity to provide comments on the proposed modification.

4. Large Energy Users Fault-ride-through

- a) Simon Tweed & Saif Aldahmor from Future Operations (EirGrid) provided a presentation on the introduction of FRT requirements for Large Energy Users.
- b) Following a query from Hariram Subramanian (Solar Generation - EirGrid) on Reactive Support, Saif Aldahmor (EirGrid) confirmed that the TSO is seeking to introduce FRT requirements only, and they are not seeking reactive support.
- c) Mostafa Bakhtvar (Fast Acting Peaking Generators - EirGrid) noted that the Demand Users switch to UPS for voltage dips. *Comment received from Mostafa Bakhtvar, 9/10/2024: Mostafa asked whether there is a plan to introduce a constraint on ramp*

rate of UPS demand during load recovery. Saif responded that EirGrid has proposed voltage ride through requirements for UPS so that the UPS demand doesn't drop during faults in the first place, and therefore negating the need for constraining the load recovery ramp rate. Mostafa noted that this is in contrary to the nature of UPS which is to switch to battery in low voltage events.

- a) Saif Aldahmor (EirGrid) said the TSO recommends a short time delay in switching to UPS to see if the voltage will recover.
- b) Paraic Higgins (Pumped Storage Generators) asked if this FRT requirement is not introduced, is there a potential to develop a new system services product for negative reserve?
- c) Gavin McClean (Demand Customers - EirGrid) noted that the UPS protects critical loads against voltage sags and expressed his concern in applying this proposed modification retrospectively due to the high cost to existing customers. He understands the challenge, but the retrospective part of this requirement will be very costly.
- d) Paul Troughton (DSU - EirGrid) agreed with Gavin and stated that retrospection is a bold move. He went on to encourage EirGrid members to engage directly with UPS manufactures to find out what they can do and what are their limits.
- e) EirGrid members have not met with OEMs, but they have met with other TSOs, and it is a challenge for the other TSOs who are also experiencing this issue.
- f) Miriam Ryan (EirGrid Chairperson) noted that the EirGrid Grid Code is retrospectively applied. Sam Matthews (JGCRP Chairperson – SONI) further advised that users can apply for a derogation.
- g) The next industry webinar on this proposal will take **Tuesday 22 October 2024, 10:00 to 12:00.**

5. Incorporation of Synchronous Condenser Units

- a) Melissa Dunne (TSO Member - EirGrid) presented an update slide on the incorporation of SCUs.
- b) No members provided any comments.

6. Regulatory Updates

- a) Lewis Ngari (CRU) provided an update on Derogations. The CRU have received 22 Derogation assessments from EirGrid. The CRU have issued position data for 12 derogations and a further 10 remain for Regulatory review. The CRU are working with EirGrid to clarify any issues that have arisen, and they will issue position data over the next couple of weeks.
- b) Payal Soni (CRU) noted that the CRU have received 2 Grid Code modification recommendations since the last GCRP meeting. They are currently reviewing the papers with the aim to progress within the next couple of weeks.
- c) Ben Harris (Utility Regulator) noted 2 derogations were received with 1 derogation at minded to decision stage. The Utility Regulator is assessing the NPDR modification and is in communication with the CRU on this.

7. AOB

- a) No other comments were raised under AOB.
- b) Sam Matthews (JGCRP Chairperson - SONI) thanked all the presenters, members, alternates, and observers for their time.
- c) The TSOs will issue the minutes by COB 08 October.