

# Minutes of the Joint Grid Code Review Panel (JGCRP) 25 September 2025

Approved

23 October 2025

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Revision History						
Revision	Date	Description	Originator	Reviewer	Checker	Approver
R0	09/10/2025	Draft Minutes	EirGrid & SONI	JGCRP Members	EirGrid & SONI	JGCRP Members
R1	23/10/2025	Approved Minutes	EirGrid & SONI	JGCRP Members	EirGrid & SONI	JGCRP Members
R2						

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# 1. EirGrid Member Attendance

Member	Present	Representing
Miriam Ryan	Y	Chairperson
Melissa Dunne	Y	TSO
Michael Coone	Y	TSO
Harry Molloy alternate for Mark Lucas/Oliver Caherty	Y	CCGT
Jennifer Geraghty	Y	Thermal Generators
Michael McCormack	Y	Thermal Generators
Mostafa Bakhtvar	Y	Fast Acting Peaking Generators
Open Position		Synchronous Renewable Generators
William Carr	Y	Pumped Storage Generators (PSG)
Peter King	Y	Non-Synchronous Renewable Generators
Kevin Moran	Declined	Non-Synchronous Renewable Generators
Thomas O'Sullivan	Y	Demand Customers
Gavin McClean	Y	
Paul Troughton	Y	Demand Side Units (DSU)
Patrick Liddy alternate for Vlastik Buzek	Y	Demand Side Units (DSU)
Tom Birney	Declined	Energy Storage Units (ESPS)
Tony Hearne	Y	Distribution System Operator (DSO)
John Whelan		
Jamie Burke	Y	Public Electricity Supplier (PES)
Darren Dodd		
Open Position		Independent Electricity Suppliers
Deirdre O'Leary	Y	CRU
Thomas Germaine	Y	Transmission Asset Owner Licensee (TAO)
Jessica Hutton		
Sorcha Dineen	N	Market Operator (MO)
		Other TSO
Colin D'Arcy alternate for Jonathan Ruddy	Y	Interconnector Owners
Daniel Moloney	Y	Solar Generators
TBC		Offshore Non-Synchronous Generators
Paul Murphy	N	Synchronous Condenser Units (SCU)

**Other Attendees:**

Name	Present	Role
Cian Fitzgerald	Y	Observer from Energia
Niamh Day	Y	Observer from CRU
Arlene Chawke	N	TSO Secretary (attended some of the meeting)
Aideen O'Hagan	Y	Presenter from EirGrid
Saad Muhammad Khan	Y	Observer from EirGrid
Gill Nolan	Y	Alternate EirGrid Chairperson (attended some of the meeting)
Páraic Kelly	Y	Observer from EirGrid
Ciaran Maguire	Y	Presenter from EirGrid
Saif Aldahmor	Y	Presenter from EirGrid
Bart Franken	Y	Observer from EirGrid
Bronagh Campbell	Y	Observer from EirGrid
Carole Devlin	Y	Observer from EirGrid
Juliana Jordano de Carvalho	Y	Observer from EirGrid
Malhar Desai	Y	Observer from EirGrid
Taulant Kerçi	Y	Observer from EirGrid
Jeff Kelliher	Y	Observer representing CRU
Dearbhla O'Brien	Y	Observer representing CRU
Michael Beggs	Y	Observer from SONI

## 2. SONI Member Attendance

Attendance: Name	Present	Role
Alan Kennedy (AK)	Y	SONI GCRP Chairperson
Peter McGreevy (PmcG)	Y	SONI GCRP Secretary
Jack McGoldrick (JMcG)	Y	TSO - Member
Sam Matthews	Y	TSO - Member
Brian Mongan (BM)	Y	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)	N	Utility Regulator (UR)
Ben Harris (BH)	Y	Utility Regulator Alternate
Breanna McLaughlin (BMcL)	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
Sarah Friedel (SF)	N	TSO- Member
James McGrann (JM)	N	Market Operator- Member
Michael Bambrick (MB)	N	Aggregator Alternate

### 3. Introduction to JGCRP Meeting & Approval of Previous Minutes

- a) Miriam Ryan (JGCRP Chairperson) welcomed all members, observers, and presenters to the meeting.
- b) No comments were received to the previous meeting minutes (26 June 2025), and they were automatically deemed approved.
- c) No actions were recorded at the previous meeting.

### 4. MPID339 and SPID\_XX\_2025 FASS Reserve Products Review

- a) Melissa Dunne (TSO) presented the EirGrid modification proposal to JGCRP members, please see slide number 4 to number 49 for further detail on the proposal. Currently, this is an EirGrid only proposal. However, the rationale for the proposed changes stems from work conducted collaboratively by SONI and EirGrid, and SONI will apply consistent rationale to their modification proposal to be presented at the December JGCRP.
- b) Jennifer Geraghty (Thermal Generators) queried why these proposed changes are being incorporated into the Grid Code if no new mandatory technical requirements will be placed on users and asked whether the proposed changes should be captured elsewhere, e.g. system service contracts or the System Services Code.
- c) Melissa Dunne (TSO) clarified that the primary purpose of the Grid Code is to provide for the safe and secure operation of the transmission system and the safety of its users. As

such, it is a document that contains requirements that the TSO is obliged to comply with, as well as requirements that users connecting to/connected to the transmission system are required to comply with. Requirements on the TSO include requirements on how the TSO operates, maintains, and develops the system. Even though users won't have new mandatory technical requirements placed on them, the TSO still needs to be empowered and obligated to operate the system in a particular way to ensure stable and secure operation. The Grid Code modification proposal includes changes that say, in order to operate a safe and secure system, the TSO will need to procure specific reserve system services and defines what those services are. Those changes both empower and oblige the TSO to procure these services and operate the system in this way to provide for adequate frequency control. The System Services Code will in large part be a market code that contains the market rules for the Day Ahead System Services Auction (DASSA), with some technical requirements related to enhanced provision from users above and beyond what the Grid Code requires users to provide. Melissa asked Carole Devlin (TSO Observer), who is leading out on the development of the System Services Code (SSC), to elaborate further on this.

- d) Carole Devlin (TSO Observer) confirmed Melissa's statement regarding the System Services Code and informed the panel that a Working Group was established to support the development of the SSC. Carole indicated that the SSC is still under development, but that plain English versions showing the progress of the SSC are published publicly, which can be shared with panel members.
- e) **POST MEETING NOTE: Including the link to the latest plain English version of the SSC:**  
[EirGrid\\_2025\\_June\\_SOEF\\_Markets\\_FASS\\_System\\_Services\\_Code\\_Plain\\_English\\_Version\\_Second\\_Draft.pdf](#)
- f) Jennifer Geraghty (Thermal Generators) asked whether the SSC would have a review panel comprised of industry representatives, like to the Grid Code Review Panel. Carole Devlin (TSO Observer) confirmed that the current position is 'yes', there will be an SSC Modifications Committee established, and the TSO will seek nominations for membership.
- g) William Carr (PSG) also queried why these changes were being proposed to the Grid Code if the RfG does not require them, indicating he understood that it was unusual to put requirements in the Grid Code that are not user-specific mandatory requirements. William also raised a concern that the reserve products may be defined differently in the Grid Code compared with the SSC, as the SSC is not yet fully developed, and queried why the Grid Code contains information on performance monitoring if provision of reserve services will not be mandatory for users.
- h) Melissa reiterated that the Grid Code has always contained requirements for the TSO, as well as for users connecting/connected to the transmission system. Melissa noted that the Grid Code does not only contain requirements specific to the RfG, and where the RfG or any Connection Network Code is silent on requirements, the TSO is responsible for development relevant requirements to ensure stable and secure operation of the transmission system, and to codify them in the Grid Code. Melissa also reiterated that the proposed changes both empower and oblige the TSO to procure these services, and operate the system in a way that provides for adequate frequency control, and that constituents of Operating Margin have always been defined in the Grid Code for this reason, even though many users under the Grid Code do not currently have explicit mandatory technical requirements with respect to standard of reserve provision.

- i) Melissa assured William that the EirGrid Grid Code team and SSC development team are working closely to ensure alignment between the two codes, and that there is no concern that the reserve products will be defined inconsistently across both codes, as SEMC have already approved the definitions. The Grid Code and SSC will incorporate the SEMC approved definitions. Melissa also explained that the Grid Code has always contained performance monitoring requirements for users to ensure stable and secure operation of the transmission system and that all Grid Code users contribute to frequency control in some way, so the proposed changes and existing Grid Code clauses explain how this monitoring will be conducted. Melissa further noted that the CRU are the owners of the Grid Code, and it is managed by the TSO, and the CRU requires the TSO to conduct performance monitoring for stable and secure operation of the system.
- j) William Carr (PSG) understands that the TSOs have an obligation to secure the system but is still concerned that the SSC has not yet been finalised and is still under development.
- k) Brian Mongan (Aggregators) noted that he shares this concern with William Carr, that the SSC has not been finalised, and requires completion before the grid Code can refer to these reserve products, Brian is also concerned that having performance monitoring requirements captured in the Grid Code is a way to utilise the Grid Code to look at performance under a market code, i.e. the SSC. Brian confirmed that he sits on the working group for the SSC development and noted that further discussion on this is required.
- l) Jennifer Geraghty (Thermal Generators) asked if Commissioning Tests will change on the back of this proposal.
- m) Melissa Dunne (TSO) confirmed that Commissioning Tests will not change based on this Grid Code modification proposal, and that users will only be required to undergo additional tests if they wish to provide reserve system services. The qualification process for this will be captured in the SSC.
- n) Thomas O'Sullivan (Demand Customers) expressed that he felt the inclusion of downward direction of reserve system services is a very good idea and vitally important as 50% of the Grid is Demand. Thomas note that Demand Customers wish to be further integrated into the grid in this way, and if the Grid Code didn't accommodate half of the market, the TSO would be losing out on a lot of system services.
- o) Paul Troughton (DSUs) expressed that all the proposed changes make sense, that the definitions are clear, and that the modification proposal demonstrates an elegant way to incorporate the necessary changes without placing new mandatory technical requirements on users. However, Paul noted several broken references in the document have occurred and need a simple tidy up.
- p) ACTION: The TSO will rectify the broken references in the modification proposal.**
- q) William Carr (PSG), with reference to the proposed change to the Grid Code definition of Extraordinary Governor Action, indicated that 'Voltage rise' is not defined in the Grid Code, and asked what the height of the rise would be over what timescale.
- r) ACTION: The TSO will look to either explicitly define 'Voltage rise' under the Grid Code at this stage or remove the reference where it may be more appropriate to address such a change in future TSO works.**
- s) POST MEETING NOTE: The revised version of MPID339 circulated with these minutes will remove reference to Voltage "rises" in the definition of Extraordinary Governor Response, as definitions and references associated with voltage rises may be better**



placed in a Grid Code review and modification proposal for non-reserve system services, and/or as an output from other future TSO workstreams.

- t) William also asked if the modification proposal would require users to submit their operating reserve capabilities to the TSO for categories of reserve that they are not obligated to provide.

u) **ACTION: The TSO will review the requirements of users to submit Operating Reserve capabilities to the TSO.**

v) **POST MEETING NOTE: The proposed change to SDC1.4.4.2 states:**

The following items are required to be submitted by each User direct to the TSO: [...]

*A **Generator-User** shall submit to the TSO the Operating Reserve capabilities for each **relevant** category of Operating Reserve and Replacement Reserve **defined listed** in OC4.6.3 for each of its **CDGUs-units** for each Imbalance Settlement Period.*

**Reference to ‘each relevant category of Operating Reserve’ should be interpreted as users only being required to submit Operating Reserve capabilities to the TSO for categories of reserve that they are obligated to provide.**

- w) William Carr (PSG) queried why a change is proposed to the definition of ‘Operational Data’, where currently the definition is “Data required under the **Operating Codes** and/or **Scheduling and Dispatch Codes**.” and the proposed change is “All data required to be supplied by either the TSO or Users under the **Grid Code** or any other data expressly provided to be **Operational Data** under the **Grid Code**.”
- x) Melissa Dunne (TSO) confirmed the proposed change aligns with the definition of “Operational Data” in the body of the Grid Code, as opposed to the Glossary of the Grid Code, and that GC.1.2 of the Grid Code states that “....Where the Glossary refers to any word or term which is more particularly defined in a part of the Grid Code, the definition in that part of the Grid Code will prevail over the definition in the Glossary in the event of any inconsistency.”
- y) **POST MEETING NOTE: MPID339 was further discussed at the EirGrid GCRP. The TSO agreed to hold a refresher/clarification webinar for industry before the end of October 2025 which will detail the purpose and intent of the SSC, demonstrate a comparison with the Grid Code, and detail the interactions between the two codes. If no feedback is received during this webinar that would warrant MPID339 returning to the JGCRP for discussion, the EirGrid GCRP reps and the TSO agree that MPID339 will be submitted to the CRU in November 2025.**

## 5. Fault Ride Through for Demand Facilities

- a) Saif Aldahmor (TSO) presented this discussion item to panel members, please see slide numbers 51 to 56.
- b) The TSOs intend to bring a proposed modification to the December 2025 JGCRP meeting.

- c) Gavin McClean (Demand Customers) noted new information (e.g., Active Power Recovery) hasn't been shared with those he and Thomas O'Sullivan (Demand Customers) represent, and he raised a concern regarding the December timeline and lack of market solutions.
- d) Saif acknowledged challenges and committed to continued engagement; the TSO understands difficulty of retrospective application.
- e) Gavin warned that all parties will be non-compliant if implemented in December and called for more engagement before decisions.
- f) Saif suggested further discussion in an offline meeting.
- g) Gavin reiterated that Active Power Recovery (500 ms) is new and needs time for internal evaluation.
- h) Miriam Ryan (Chairperson - EirGrid TSO) noted similar challenges occurred with RoCoF changes; it was put in place in principle as they worked with customers case by case. She noted that there are 2 elements; (1) What do we need in the Grid Code to secure the system and (2) working with users to ensure it is implementable. She ensures that the Grid Code requirements will not go through in December if it is unachievable.
- i) ACTION: All to review the information paper to help shape proposals and timing.**
- j) Thomas O'Sullivan (Demand Customers) echoed Gavin's concerns; he welcomes engagement but warned of difficulty communicating changes if feedback isn't considered.
- k) Miriam stated that any Grid Code modification must meet specific criteria (justifiable, appropriate, proportionate and achievable).
- l) Saif noted that the paper includes justifications and proposed requirements from other TSOs. Saif also highlighted that, based on presentations from various OEMs, there appear to be promising solutions emerging from the OEM side. Thomas agreed on the need for a secure grid; current power delivery is imperfect.
- m) Reference made to "Shaping Our Electricity Future"; noted burden on consumers not previously involved.
- n) ACTION: The TSO to send link to Information paper to members. (Update: The publication of the information paper has been delayed, with the aim to release it within the next few weeks. Once published, the TSO will share the link with all members.**
- o) William Carr (PSG) raised concerns about retrospective application; noted variability in OEM guarantees post-sale.
- p) Saif noted other TSOs are facing similar challenges.
- q) Patrick Liddy (DSU) asked how requirements will be tested - during CA, via existing providers, or DSU sites.
- r) Miriam clarified testing will be study-based, not fault-injected; typically done prior to energisation, with retrospective agreements as needed.
- s) Patrick expressed concern that requirements might apply to DSUs only. Clarification provided: Applies only to transmission-connected demand facilities, not just DSUs.

- t) Paul Troughton (DSU) asked if other TSOs have similar requirements; noted he hasn't seen Active Power Recovery elsewhere. It was clarified that several TSOs have proposed Post Fault Active Power Recovery requirements, details are provided in the Information paper.
- u) Thomas asked whether the DSO would need to comply with Grid Code rules.
- v) Tony Hearne (DSO) noted that if Grid Code modification is approved, similar change will be needed for Distribution Code; MW threshold to be developed. DSO assets may be used in studies.
- w) Gavin noted other TSOs do not apply changes retrospectively and offer longer timelines.
- x) Saif explained retrospective application is justified due to high data centre demand (>25%); past events saw >50% loss. (Others 2-3%)
- y) Gavin stated retrospective implementation is costly and time-consuming.
- z) **ACTION: TSOs to share document link (North and South); feedback encouraged with a Workshop to be scheduled.**

## 6. Regulatory Updates

- a) Niamh Day (CRU) provided an update on behalf of that the CRU, please see slide 57.
- b) Ben Harris (UR) provided an update on behalf of the UR. The UR have published one decision since the previous meeting and have one modification under review.

## 7. AOB

- a) No other comments were raised under AOB.