

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

02 November 2021

Member Attendance:

<u>Name</u>	<u>Present</u>	<u>Role</u>	<u>Panel</u>
Miriam Ryan	Y	Alternate EirGrid GCRP Chair	EirGrid
Niamh Daly	Y	TSO Member	EirGrid
Anne Trotter	Y	TSO Member	EirGrid
Michael McCormack	Y	Grid Connected Thermal Generators	EirGrid
Jennifer Geraghty	N	Grid Connected Thermal Generators	EirGrid
Oliver Caherty	Y	Grid Connected CCGT Generators	EirGrid
Daniel Grandjean	N	Grid Connected CCGT Generators	EirGrid
Mark Coleman	Y	Grid Connected Non-Synchronous Renewable Generators	EirGrid
Peter King	Y	Grid Connected Non-Synchronous Renewable Generators	EirGrid
Philip Blythe alternate for Paraic Higgins	Y	Grid Connected Pumped Storage	EirGrid
Position Open		Grid Connected Synchronous Renewable Generators	EirGrid
Pat O'Donnell	Y	Grid Connected Fast Peaking Plants	EirGrid
Mark Phelan	Y	ESB PES	EirGrid
Position open		Independent Electricity Supplier	
Cormac Fitzpatrick	N	Transmission Asset Owner	EirGrid
Dylan Ashe alternate for Robert O'Rourke	Y	Regulator	EirGrid
Karl O'Keefe	N	IE - Interconnector Owner	EirGrid
Deirdre Hughes	Y	Market Operator	EirGrid
Grainne O'Shea alternate for Tony Hearne	Y	Distribution System Operator	EirGrid
Eoin Sweeney alternate for Paddy Finn	Y	Grid Connected Demand Side Units	EirGrid
Seamus King	Y	Grid Connected Demand Side Units	EirGrid

Position Open	N	Grid Connected Demand Customers	EirGrid
Tom Birney	Y	Battery Storage	EirGrid
Marie-Therese Campbell	Y	JGCRP GCRP Chair	SONI
Sam Matthews	Y	TSO Member	SONI
Daniel McSwiggan	Y	TSO Member	SONI
Brian Mongan	Y	Aggregator Member	SONI
Cathal Martin	Y	RES - Renewable Generation	SONI
Stephen Hemphill	N	Interconnector Owners - NI	SONI
Stephen Brownlees	Y	Generators - NI	SONI
Joe Coyle	N	Generators - NI	SONI
Tim Steele	Y	UR Alternate	SONI
Jody O'Boyle	Y	UR Member	SONI
Position Open	N	Energy Storage	SONI

Other Attendees:

<u>Name</u>	<u>Present</u>	<u>Role</u>	<u>Panel</u>
Arlene Chawke	Y	TSO Secretary	EirGrid
Rebecca Russell	Y	Observer	SONI
Paul Troughton	Y	Presenter	Enel X
Gill Nolan	Y	Observer	EirGrid
John Carnwath	Y	Observer	EirGrid
Martin Kerin	Y	Observer	EirGrid
Angela Blair	Y	Power NI PPB Observer	SONI

1. Introduction to JGCRP Meeting & Approval of Minutes

- a) Miriam Ryan (JGCRP Chair - EirGrid) welcomed all members, observers and presenters to the meeting.
- b) No further comments were received to the minutes of the previous meeting and the minutes were deemed approved.
- c) Miriam Ryan (JGCRP Chair - EirGrid) reviewed the actions from the previous meeting:
 1. All-island Review of the definition of Registered Capacity - Mark Coleman (Non-synchronous Renewable Generators) recommended that the TSOs issue a clarification in the form of an interim guideline on the application of MEC versus Registered Capacity, together with the differences in their application in SONI and in EirGrid.

Action: Closed

EirGrid have issued the guideline to the members of the EirGrid GCRP. The members have until the 30 November to provide comments to EirGrid. EirGrid will consider any comments received before a finalised guideline is published.

2. The DRAI to draft a Grid Code modification proposal and submit to the TSOs. The plan is to host an extraordinary meeting at the end of April.

Action: Closed

The DRAI have issued a proposed modification paper to both TSOs and will present it at today's JGCRP meeting. It will be voted upon at the respective EirGrid and SONI GCRP meetings.

3. All-island Review of the definition of Registered Capacity - present findings of Phase 1

Action: Closed

This is an agenda item for today's meeting.

4. Removal of Demand Side and Generator Aggregator minimum size.

Action: Both TSOs will investigate how the 4 MW was derived and will report back to the panel members.

Action: Closed

This is a historical figure and the TSOs could not find the origin.

Brian Mongan (SONI Aggregator Member) confirmed he is happy with this response and is keen to move forward with the presentation of the FERA modification proposal at today's meeting.

Action: Marie-Therese Campbell (SONI Chair) has actioned both EirGrid and SONI to meet with Brian Mongan (SONI Aggregator Member) to discuss the principles of the FERA proposal. The TSOs will carry out an impact assessment of removing the 4 MW limitation.

Action: Closed

Engagement took place.

5. Grid Code Requirement for Offshore PPMs

Action: Miriam Ryan (Chair – EirGrid) will pass on the concerns made by Cathal Martin (RES Renewable Generation - SONI) to the working group.

Action: Cathal Martin (RES Renewable Generation - SONI) welcomed the opportunity for Wind Energy Ireland to engage with the working group.

Action: Remains open

Miriam Ryan (Chair JGCRP – EirGrid) passed on the concerns raised by Cathal Martin (SONI RES - Renewable Generation) to the TSO working group. Cathal Martin confirmed that engagement has yet to take place with Wind Energy Ireland and he would like the action to remain open.

Action: Jody O'Boyle (UR - SONI) will follow up with ENTSO-E to find out the status of requirements that have been enforced, can requirements be withdrawn, replaced or if a derogation is required?

Action: Closed.

Jody O'Boyle (UR) confirmed that the current Network Code requirements remain enforce. Marie-Therese Campbell (SONI GCRP Chair) further noted that the legal team in EirGrid/SONI have confirmed that all future codes will also apply.

3. Discussion on MPID 293: DSU Maximum Down Time

- a) Paul Troughton (EnelX) presented slides (slides numbers 3 – 7) on the removal of clause CC.7.4(e) from the EirGrid Grid Code and CC.13.1(e) from the SONI Grid Code, the removal of these clauses will allow DSUs to specify any value for Maximum Down Time. Over the past couple of months, much engagement has taken place between the TSOs and the DRAI on this modification proposal. The TSOs have come back with an alternative proposal but this does not resolve the issue for the DRAI.
- b) The slides, as presented by Paul Troughton (EnelX), outline the modification proposal, the reasons for the modification proposal and its impact. In response to concerns raised by the National Control Centre (NCC) about dispatchability, the DRAI queried whether the NCC can already see the duration of downtimes because the 2-hour time is set as a minimum and a unit can have a longer Maximum Down Time, such as 4 hours. Following on from that, if the NCC tools assume 2-hour duration, as a temporary workaround, changes could be made to the naming convention to allow NCC Operators to see which DSUs have less than 2-hour durations. The DRAI also noted that this modification will be of benefit to competition by allowing more DSUs to participate in system services. He also added that the current DSUs have already committed to providing a certain de-rated capacity for the next four years and if they were to reduce any maximum down times to below their current 2-hour durations then the substantial change in de-rating factors would mean that the DSUs could not meet their commitments. He concluded that no existing DSUs would be likely to reduce their durations, and there is a strong incentive for all DSUs to offer the longest durations they can manage.
- c) John Carnwath (EirGrid Observer) noted that the TSOs have prudently considered this modification proposal and have engaged with the DRAI over the past couple of months. EirGrid recognise that DSUs have a major role to play in the future of the grid but at this time the TSOs cannot support this proposed modification. In the short term the TSOs are fully focused on the security of supply in terms of this winter. The maximum down time of 2-hours is critical to the operation of the grid and DSU capacity needs to be provided on a sustained basis. There are several operational concerns as to why the TSOs cannot support this modification at this time and critically increased operational complexity will impact the safe operation of the grid. There are also IT system limitations and any changes to key critical control centre systems will take time to implement and is seen as a major TSO undertaking. The TSOs recognise the key role that Demand Side will play under the Shaping Our Electricity Future initiative and the TSO will prioritise Demand Side concerns under this initiative.
- d) Martin Kerin (EirGrid Observer) noted that the proposal makes sense from a system services point of view and there is value in considering this under Shaping Our Electricity Future. The current focus for the TSOs is having reliable, consistent capacity to help manage the current risks to the security of supply - increased dispatch instructions and multiple units ramping up and down will increase the operational burden for the control centres and could cause frequency issues, both of which could pose risks to system security. The TSOs are committed to prioritising this proposal when the focus for the TSOs moves to the availability of system services.

- e) Brian Mongan (Aggregator Member – SONI) spoke, on behalf of FERA (Federation of Energy Response Aggregators), to fully support the DRAI proposal. He went on to say that he sympathises with the resources in the control centre having listened to the concerns made by the EirGrid observers. Having said that, the capacity auctions have already been run and units have their positions set for this winter and the following winter. This proposal allows for changes to the registration of units. Grid Code requirements are modified to ensure there is equality and to ensure Users are compliant with the European Network Codes; Users cannot not modify requirements because the resources are not available to do so. We need to move forward and ensure everyone has equal access to the markets.
- f) Marie-Therese Campbell (SONI GCRP Chair) re-iterated that the views of the EirGrid observers mirrors the view of the SONI control room operators.
- g) Paul Troughton (EnelX) closing comments included that there is nothing in this proposal that will make this winter any harder, but it will open the door to more participation in system services. Currently Fast Frequency Response can be provided by a battery unit with a ten-minute duration and questioned why a DSU cannot be allowed do the same thing.
- h) Paul Troughton (EnelX) will present this as a proposed modification to the EirGrid GCRP members and Brian Mongan (Aggregator Member – SONI) will present this as a proposed modification to the SONI GCRP members.

4. Discussion on MPID 299 - Removal of Demand Side and Generator Aggregator minimum size

- a) Brian Mongan (Aggregator Member – SONI) presented, on behalf of FERA, a discussion item on the removal of Demand Side and Generator Aggregator minimum size from the SONI Grid Code and the EirGrid Grid Code (slides 8 – 14). Brian Mongan further noted that this is the only technology, that he can identify, that has the 4 MW limitation. The removal of this limitation would ensure more participation in system services and hence the capabilities of aggregated sites are fully utilised. The slides present an outline of the current requirements, the proposal itself and the impact of the modification.
- b) Martin Kerin (EirGrid Observer) noted that at this time EirGrid and SONI cannot support this modification proposal. He further clarified that this is not a resource issue. System security is the current focus for the TSOs. Additional resources will not rectify this, as the operational impact of dispatching smaller units will draw attention away from vital capacity balancing tasks. When the current system security issues are resolved the focus will switch to increasing the availability of ancillary and system services. The TSOs came up with an alternative proposal to try and resolve these issues with the DRAI and FERA modifications in the short term, where those units (e.g. between 1 and 4 MW, and/or less than 2hr maximum down time) could be allowed to provide system services only, and therefore wouldn't be considered for dispatch at system peak times when there are heightened system security issues. This would have given those units the access being requested, while not causing the system security issues from having to consider them in real-time dispatch to balance the system.

- c) Brian Mongan (Aggregator Member – SONI) responded to those comments by once again highlighting that the capacity auctions have already been run and units have their positions set for next four years. He also added that the de-rating factor discourages DSUs and Demand Side services may not be available into the future. There are also changes coming down the road for Demand Side with the Clean Energy Package. He recommends that industry rules be changed now.
- d) Paul Troughton (EnelX) further added that the impact is entirely on registration for this winter and next winter and won't affect capacity.
- e) Anne Trotter (TSO Member - EirGrid) noted that we are all agreed that Demand Side services are a key part of the future and a lot of work is currently being done internally, in EirGrid/SONI, on DSM strategy. This strategy must be looked at in a holistic way, rather than changing rules one by one.
- e) Brian Mongan (Aggregator Member – SONI) given the industry experience with FlexTech he does not accept pushing this into a long-term strategy such as Shaping Our Electricity Future. This is not about designing something new, it is about removing discrimination in the codes and increasing the ability to provide flexibility.
- f) Jody O'Boyle (UR) highlighted that in Northern Ireland the figure of 4MW is referenced in Demand Side Generator licences, this would need to change if this Grid Code change goes ahead.
- g) **ACTION: Following on from the observation made by Jody O'Boyle (UR), Dylan Ashe (CRU) took an action to check the Demand Side Generator licences in Ireland.**
- h) In relation to a comment from Stephen Brownlees (Generators - NI) on the management of these proposals given that they are being brought to the respective panels, Northern Ireland and Ireland. Marie-Therese (SONI Chair) confirmed that there are jurisdictional Grid Codes and the modification process differs with a consultation process in Northern Ireland that does not exist in Ireland. There may be differences in the process but there is no difference in the TSOs view on this proposal. Miriam Ryan (JGCRP Chair EirGrid) noted that outside of SDC 1 and 2 that we have different requirements for users and each TSO is responsible for the implementation of the code in their respective area. The TSOs were keen to bring this as a discussion item to the JGCRP meeting to ensure a collective discussion took place ahead of voting at the respective GCRP meetings.
- i) Grainne O'Shea (DSO) added that ESB Networks have launched a major flagship programme "National Network, Local Connections" looking at adapting networks to allow users to use the network in the way that they want. The DSO and EirGrid are also launching a joint programme to include a workstream on integrating demand side and aggregators into the market and adapting the control centre tools to enable this. The consultation will launch next year. The DSO values the contribution of Demand Side and recommends that these modifications be considered as part of the joint consultation.
- j) Paul Troughton (EnelX) will present this as a proposed modification to the EirGrid GCRP members and Brian Mongan (Aggregator Member – SONI) will present this as a proposed modification to the SONI GCRP members.

5. Update on the Definition of Registered Capacity Review

- a) Miriam Ryan (JGCRP Chair - EirGrid) provided a verbal update on the status of the review. Three meetings have taken place with representatives from all four SOs in attendance. The terms of reference have been agreed. The group have identified several key definitions that sit alongside the definition for Registered Capacity. The group have also identified several terms that are used to describe Registered Capacity, not all of these have a definition.
- b) Most recent discussions have focused on the use of invertors. None of the identified definitions refer to invertors, as a result operator and customer interpretation has been applied on their impact on Registered Capacity. A decision has been made by the SOs to move forward with a single definition for Registered Capacity applied to all user types with different characteristics called out for the different user types, as required. The next meeting will take place in two weeks and future updates will be provided via the Joint GCRP meetings and each of the respective GCRP meetings.

6. Regulatory Updates

- a) Dylan Ashe (CRU) noted that all outstanding modification recommendations are at an advanced stage of the CRU decision process and decision papers are imminent.
- b) Jody O'Boyle (UR) noted that the UR are currently engaged with SONI on an active modification involving a derogation from EPK and this will be discussed at the SONI GCRP Meeting.

7. AOB

- a) No items were raised under AOB.