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Mr. Robert O'Rourke
Commission for Energy Regulation
The Exchange
Belgard Square North
Tallaght
Dublin 24

Re: MPID 218 – Waste-to-Energy Grid Code Modification

Dear Robert,

EirGrid tabled a motion for discussion at the Irish Grid Code Review Panel (no.29, 13th October 2011) regarding the exemption of Waste-to-Energy units from providing Operating Reserve.

It was motioned that the EPA license conditions precluded the Waste-to-Energy units from providing Operating Reserve as it would reduce their overall efficiency. In tandem with this, EirGrid had also considered that a limited amount of these units could be accommodated, and that the Operating Reserve could be sourced from elsewhere.

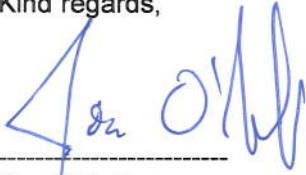
All members recognised the benefits of Waste-to-Energy units but some members of the panel acknowledged that the provision of Operating Reserve is crucial to system security and that no exemptions should be made for such provision. It was pointed out that the derogation course of action is open to all users of the transmission system who cannot comply with any provision of the Grid Code.

It has since come to EirGrid's attention that the ENTSO-E network code, which will be entering its EU comitology phase soon, provides no such exemption for Waste-to-Energy units. These generation units must be capable of providing Operating Reserve, similar to every other conventional unit. As this European network code will supersede the Ireland and Northern Ireland Grid Codes, it would be an unnecessary waste of resources to pursue this modification, only to have it reversed when the European code comes into force.

In addition to this, recent experience by EirGrid of testing a Waste-to-Energy unit has shown that the Operating Reserve requirement does not cause any insurmountable technical or operational difficulties.

On this basis, EirGrid recommend that no modification be brought forward to the Grid Code.

Kind regards,

A handwritten signature in blue ink, appearing to read 'Jon O'Sullivan', written over a horizontal dashed line.

Jon O'Sullivan
Grid Code Review Panel, Chairperson.
Operations Sustainable Power Systems, Manager.