



Miriam Ryan
EirGrid
The Oval
160 Shelbourne Road
Dublin 4
D04 FW28

Date: 09 March 2026

Our Ref: D/26/5111

Re: MPID 293: DSU Maximum Down Time Two Hours

Dear Miriam,

I refer to EirGrid's submission of a recommendation paper to the CRU on the 18 February 2022 on Grid Code Modification MPID 293 Demand Side Unit (DSU) Maximum Down Time, and the subsequent interim solutions proposed by DSU representatives.

Background

The CRU received a Grid Code Modification Proposal in relation to DSU Maximum Down Time in February 2022. The modification was proposed by DSU representatives. The TSO did not support the modification. In October 2023, the CRU directed EirGrid to establish a Working Group with the DRAI and the Federation of Energy Response Aggregators (FERA) to develop a proposal to achieve a solution in relation to the MPID 293 ¹ recommendation. The Working Group concluded in January 2025.

There were two key outcomes from the Working Group:

1. The members agreed on the development of a new System Services User type in the Grid Code as an enduring solution;
2. The DSU representatives submitted three proposals for an interim solution to MPID 293 to the CRU and the TSO for consideration, noting that the enduring solution would take time to implement.

The CRU's decision, as set out in this letter, relates to the original modification proposal, MPID 293, and the interim solutions.

¹ A separate modification proposal MPID 299 was also included in the scope of the Working Group but was subsequently withdrawn.



CRU Decision

The CRU is satisfied that EirGrid has issued the recommendation paper for MPID 293 to the CRU in accordance with the relevant provisions set out in the Grid Code and that the views of stakeholders have been considered and noted.

The DSU proposals for an interim solution and the TSO assessment thereof were submitted to the CRU for consideration in December 2024 and January 2025 respectively, in accordance with the Terms of Reference of the DSU-TSO Working Group.

The CRU has carefully considered the MPID 293 modification proposal, the TSO recommendation paper for MPID 293 and the DSU proposals and TSO assessment of the three interim solutions.

The CRU's decision is to reject MPID 293 and the three interim solutions due to potential system and market risks and impacts. The market and system risks and impacts identified by the TSO have been independently assessed by technical consultants on behalf of the CRU.

The CRU agrees that a solution is required to address the issue created by retaining the DSU Maximum Down Time Requirement in the Grid Code. The CRU also agrees that the creation of a new System Services User type is a more appropriate solution to address this issue.

The CRU is of the view that the implementation of the necessary system changes by the TSO to facilitate the creation of a new System Services User Type should be progressed without delay to ensure an enduring solution is in place in advance of the implementation of the Day Ahead System Services Auction (DASSA) currently scheduled for May 2027.

The CRU instructs the TSO to:

- progress implementation of the enduring solution (new System Service User type), as agreed by the MPID 293 DSU – TSO Working Group;
- provide a timeline for completion of the enduring solution to the CRU and members of the Working Group, and regular updates on progress against that timeline; and
- initiate and progress any Grid Code modifications required to enable the enduring solution to be implemented.



An Coimisiún
um Rialáil Fóntas
Commission for
Regulation of Utilities

Yours sincerely,

Sent by email and accordingly bears no signature

Deirdre O'Leary
Utility Performance Manager

cc. Paul Troughton, Enel X
Patrick Liddy, DSU Representative
Brian Mongan, Federation of Energy Response Aggregators (FERA)
Matt O' Kane, iPower
Deirdre Hughes, EirGrid
Martin Kerin, EirGrid
Charlie McGee, EirGrid
Melissa Dunne, EirGrid
Mark Phelan, Secretary of DCRP
Arlene Chawke, Secretary of GCRP
Niamh Day, CRU