

**Grid Code
Modification
Recommendation Form**



Title of Recommended Proposal:

MPID 305 – Incorporation of Offshore PPM Requirements

Date:	26/10/2023
Recommended at GCRP Meeting No.:	The modification was presented at the Ireland GCRP meeting dated 27 September 2023.
Grid Code Version:	12
Grid Code Section(s) Impacted by Recommended Proposal:	See the document "MPID305_GridCodeModLocations.xlsx" for details of the modified sections.

The Reason for the Recommended Modification:

The Grid Code is a living document and is constantly evolving. This evolution includes the incorporation of new User types. The purpose of this modification is to incorporate the Grid Code requirements for Offshore PPMs, which is a new subtype of Controllable PPMs.

Background:

The 2020 Programme for Government made a commitment that up to 80% of Ireland's electricity will be produced from renewable sources by 2030. This will be achieved, in part, through the installation of 5 GW of offshore wind generation capacity in Ireland's maritime area over the next 7 years.

This 5 GW of wind generation capacity will be installed in three different phases.

Phase 1 will be developer led and will consist of 4 individual offshore wind farm arrays, each of which will consist of one or more Offshore PPMs. These Offshore PPMs will connect to the Transmission System via an offshore Connection Point on an offshore platform.

This modification details requirements that each Phase 1 Offshore PPM must meet at their offshore Connection Point.

As part of the development of this proposal several key elements were considered. These included but were not limited to:

- Existing Grid Code requirements for PPMs;
- RfG requirements for PPMs; and
- the Offshore PPM Design and Operation Philosophy document,

as well as drawing on the knowledge of key subject matter experts, both internal and external to EirGrid.

As part of the development of the proposed modification, a draft of the proposed modification was previously circulated to the Offshore PPM developers for comment and was discussed at an industry workshop in April 2023, with the intention of presenting the proposed modification to the June GCRP meeting. However, this was postponed allowing more time for the comments received from the offshore PPM developers.

Between April 2023 and Sept 2023, several meetings and workshops took place. A total of over 80 comments were received from the Phase 1 Offshore PPM developers via a comment log and email.

To date all but two of these comments have been closed. The outstanding comments are described below:

1. Harmonic Voltage distortion:

A comment was raised regarding the application of the planning standards in the IEC 61000-3-6 planning levels at the Offshore PPM connection point.

It is noted EirGrid is carrying out a review of their harmonic policy. This review will address the received comment by reviewing the application of harmonic limits at the offshore PPM connection point. EirGrid will engage with the Offshore PPM developers over the course of this review. Once the review of the harmonic policy is completed, any necessary Grid Code modifications will be brought forward to the GCRP.

2. Multiple configurations for the Offshore PPMs within the windfarm array:

This comment has been placed on hold pending the outcome of the ongoing consultation on the Connection Point for Offshore PPMs and does not form part of this proposed modification. Following the completion of the consultation, EirGrid will review the open comment and will determine if any further Grid Code modifications are required.

The Grid Code is constantly evolving to ensure that the requirements for all Users are appropriate and fit for purpose, whilst ensuring the ongoing safety and security of the Transmission System. We note that works regarding the future connection of Offshore PPMs are ongoing. These works include but are not limited to the provision of detailed designs and the provision of models, and the completion of studies such as fault clearance studies for 66 kV. If or when these ongoing works raise any issues with the requirements detailed in this proposal, EirGrid will carry out a review of the requirements, and if necessary, will put forward any required modifications.

History of Progression through GCRPs, Working Group and/or Consultation:

In advance of 27 September 2023 GCRP meeting, the MPID305 proposal paper, along with the red and green versions and location document, were circulated to the GCRP members on 12 September 2023.

On Monday 25 September, GCRP member Tony Hearne (ESBN) returned two comments in relation to the proposed changes to OC.11 – Safety Rules. The submitted comments with tracked changes are shown below:

“OC.11.4.1 The safety of personnel working on or in close proximity to Transmission System Plant and Apparatus for or on behalf of the TSO is governed by the ESB Networks Electrical Safety Rules, [EirGrid Safety Rules](#) or User Safety Rules, or [as specified in the relevant Interface document.](#)~~appropriate~~”

“OC.11.4.6 [In the event of a conflict between the provisions of the EirGrid Safety Rules and the provisions of the ESB Networks Electrical Safety Rules, at the interface between them, the provisions of the ESB Networks Electrical Safety Rules shall take precedence.](#)”

Following the submission of these comments, it was determined that further discussion between ESBN and EirGrid were required. During the week starting 02 October 2023, EirGrid and ESBN met twice to discuss the comments received. These discussions are ongoing. The changes proposed by ESBN have not been included in the current updated red and green line versions for MPID 305. However, it has been agreed should any modifications come out of these ongoing discussions they will be proposed to the GCRP members at a future GCRP meeting.

The proposed modification, as circulated on 12 September 2023, was presented at the 27 September 2023 GCRP meeting. A comment was raised by GCRP member Peter King noting that the exclusion of Offshore PPMs from clause CC.7.3.3 was previously covered by the recommended modification, MPID 309. Miriam Ryan (GCRP Chairperson) took an action to review MPID309 (as approved by the CRU on 25 September 2023) and to circulate revised red and green line versions of MPID305 with the draft minute of the GCRP meeting to address this comment. It was agreed that the GCRP members will be given two weeks to respond before a final recommendation is issued to the CRU.

The revised Red and Green line versions of MPID305 were circulated to the GCRP members along with the draft minutes from the 27 September meeting. The deadline for comments from GCRP members was 24 Oct 2023. No comments were received.

EirGrid trusts that the requirements for Offshore PPMs as detailed in this proposed modification are correct, based on the information available to date.

As agreed at the 27 September 2023 GCRP, EirGrid is now submitting MPID305 recommendation paper to the CRU for approval.

Summary Note of any Objections to the Recommended Change from GCRP Members or Consultation Responses:

There were no objections to the recommended changes from the GCRP members, other than the comment raised by GCRP member Peter King at 27 September 2023 GCRP meeting – as detailed above. This comment and the subsequent change to the proposed modification has been addressed prior to the submission of the modification for approval.

Outcome of any GCRP Meeting Actions Relating to the Recommended Modification:

The action taken by Miriam Ryan (Chairperson) regarding the exclusion of Offshore PPMs from clause CC.7.3.3 was previously covered by the recommended modification, MPID 309, as described above, is now closed.

Red-line Version of Impacted Grid Code Section(s) - show recommended changes to text:

Deleted text in ~~strike-through red font~~ and new text highlighted in *blue font*

See the document "*MPID305_Redline_OffshorePPM_Incorporation.doc*"

Green-line Version of Impacted Grid Code Section(s) - show recommended final text:

See the document "*MPID305_Greenline_OffshorePPM_Incorporation.doc*"