Fault Ride Through / Active Power Recovery / Rate of Change of Frequency Grid Code Modification (MPID345)

Compliance and Derogation Framework Proposal

April 2026

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Contents

Glossary of terms

Acronym	Meaning
APR	Active Power Recovery
BESS	Battery Energy Storage System
CRU	Commission for Regulation of Utilities
ESB	Electricity Supply Board
FRT	Fault Ride Through
HVDC	High Voltage Direct Current
Hz	Hertz (unit of frequency)
kV	Kilo-Volt
MEC	Maximum Export Capacity
MIC	Maximum Import Capacity
MVA	Mega Volt-Ampere
MW	Mega Watt
NESO	National Energy System Operator
OEM	Original Equipment Manufacturer
RoCoF	Rate of Change of Frequency
SEMO	Single Electricity Market Operator
SONI	System Operator for Northern Ireland
TSO	Transmission System Operator
UPS	Uninterruptible Power Supply

1. Introduction

The purpose of this document is to set out EirGrid's proposal for a Compliance and Derogation Framework ('Framework') to support the Demand Facility Fault Ride Through, Active Power Recovery and Rate of Change of Frequency (FRT/APR/RoCoF) Grid Code Modification proposal MPID345[1] ('MPID345'). The proposed MPID345 will insert new Clauses CC.7.4.3.1 and CC.7.4.3.2 into the Grid Code.

If non-MPID345-compliant demand continues to increase as forecast, we will soon reach the limit of demand loss that can be securely accommodated on the power system.

In addition to the operational measures already implemented by EirGrid, our proposed approach to managing this issue is to recommend that MPID345 requirements are implemented immediately in the Grid Code. This will ensure that all Demand Facilities (both existing and future Demand Facilities) are required to meet these technical requirements.

If non-MPID345-compliant demand continues to grow and our operational measures are exhausted, the TSO will be required to take actions to reduce non-MPID345-compliant demand as necessary.

Based on industry feedback during the development of MPID345, it is anticipated that there will initially be an inability to comply with the proposed requirements across most existing transmission connected Demand Facilities as technical solutions remain under development. EirGrid therefore requires mechanisms to manage the risk to the power system (in addition to those already utilised by EirGrid), pending Demand Facilities' implementation of solutions to achieve compliance with MPID345.

Bringing forward MPID345 within the proposed Framework outlined in this document, which incorporates a derogations proposal for Demand Facilities that will not be initially compliant with MPID345, will support EirGrid's ability to manage the current issue, while enabling Demand Facilities to assess and progress compliance in a timely manner.

This document sets out EirGrid's proposal, which is subject to CRU approval. As such, this document is subject to change. Nothing in this document shall be construed in and of itself as creating any obligation on the part of EirGrid. EirGrid makes no warranties or representations of any kind with respect to the information or proposals in this paper, including as to its quality, accuracy or completeness. Reliance on or use of the proposals or information set out in this document is at the user's sole risk and EirGrid does not accept any liability for any loss or damage arising from any such reliance on or use of same. EirGrid reserves the right to amend, update, or replace this paper to reflect new or amended CRU directions, changes in legislation, system conditions, market arrangements, industry standards, and/or internal policy requirements.

[1] https://www.eirgrid.ie/grid/grid-codes-and-compliance-overview/grid-code-modifications

2. Industry Engagement

EirGrid has engaged extensively with industry over the past number of years on the FRT issue. Our engagement initially focused on understanding the drivers of the issue from a data centre Demand Facility perspective, gathering individual data centre site protection setting data (to inform our models), notifying data centres of performance issues observed during fault events, and communicating the broader power system challenges arising and need for solutions. While our engagement initially focussed on data centres, as the issue evolved this engagement extended to wider non-data centre transmission connected demand customers and other key stakeholders.

Commencing in 2024, and running through to the end of 2025, EirGrid engaged extensively with industry on the proposed Grid Code requirements for Demand Facilities to remain connected during short-term disturbances. This process concluded with the development of MPID345 covering FRT, APR, and RoCoF requirements for Demand Facilities. The proposals will enhance overall grid stability and reliability while supporting the continued growth of all Demand Facilities in line with connection contracts and government policy.

The proposed MPID345 is crucial for ensuring the security and stability of a power system facing increasing demand from large energy users and its proposals are in line with evolving industry best practices[2].

EirGrid has focused its recent industry webinars and bilateral industry meetings on the proposed Framework. Through these engagements, the data centre industry and wider non-data centre transmission-connected demand customers have provided feedback to EirGrid on earlier versions of the proposed Framework. EirGrid has also engaged with the relevant government departments and the Commission for Regulation of Utilities (CRU) on developing the Framework.

In so far as possible, EirGrid has evolved the proposed Framework in response to the feedback received, with the proposal presented in this paper representing our efforts to address the concerns of industry while also ensuring that EirGrid can continue to operate the power system securely while customers progress compliance with the proposed MPID345 requirements.

EirGrid's proposed Framework is set out in the remainder of this paper.

The following table summarises the key industry communications and engagements which have taken place to date on the Framework. A broader list of engagements on the FRT topic and development of the Grid Code Modification itself are contained in the EirGrid Grid Code Modification Proposal Form MPID345.

Date	Webinar/ Task force meeting	Topic	Recipient / Participant
30 April 2024 22 October 2024 10 December 2024 3 November 2025	1st Industry Webinar 2nd Industry Webinar 3rd Industry Webinar 4th Industry Webinar	Overview of the FRT issue. The Grid Code Modification was introduced in the second industry webinar.	Webinar 1: All Transmission Connected/Contracted Data Centre Demand Facilities Webinar 2 - 4: All Transmission-Connected Demand Facilities, EirGrid Grid Code Review Panel, CRU
26 November 2025	5th Industry Webinar	Summary of the feedback received from industry was presented, along with the TSO response.	All Transmission-Connected Demand Facilities, EirGrid Grid Code Review Panel, CRU

[2] MPID345-Large-Demand-Facility-Fault-Ride-Through-Issue-and-Proposed-Solutions-EirGrid-and-SONI-Information-Paper-November-2025.pdf

17 December 2025	N/A	Overview of proposed Grid Code Modification MPID345 Framework issued via email.	All Transmission-Connected Demand Facilities, EirGrid Grid Code Review Panel, CRU
14 January 2026	6th Industry Webinar	Presentation of the proposed Grid Code Modification MPID345 Framework.	All Transmission-Connected Demand Facilities, EirGrid Grid Code Review Panel, CRU
19 January 2026	7th Industry Webinar	Follow-up engagement on the proposed Framework.	All Transmission-Connected Demand Facilities, EirGrid Grid Code Review Panel, CRU
11 February 2026	8th Industry Webinar	Presentation of updated Grid Code Modification MPID345 Framework proposals.	All Transmission-Connected Demand Facilities, EirGrid Grid Code Review Panel, CRU
12 March 2026	9th Industry Webinar	Presentation of updated Grid Code Modification MPID345 Framework proposals.	All Transmission-Connected Demand Facilities, EirGrid Grid Code Review Panel, CRU
2022 – March 2026	Bi-lateral Engagements	Numerous bi-lateral engagements took place on: • The FRT issue • MPID345 • Compliance & Derogation Framework for MPID345	Transmission-Connected Demand Facilities, Industry representative bodies and OEMs

Table 1 Industry Engagement

Below is a summary of the feedback received from these engagements as well as EirGrid's response:

Date	Source	Industry Feedback	EirGrid's Response/Action
17 Nov 2025	Large Demand Facility Fault Ride-Through Issue and Proposed Solutions – Information Paper prepared by	**Application and Temporary Derogations** Industry highlighted the challenges of applying new requirements to existing facilities. They requested that temporary derogations be considered to align with the operational lifespan of currently installed UPS systems.	The comments in the Webinars in November were prior to the design of the Compliance and Derogation framework. The feedback received has, to the extent EirGrid considers possible, been factored into the development of the proposed Framework.

Date	Source	Industry Feedback	EirGrid's Response/Action
	EirGrid and SONI		
26 Nov 2025	5th Industry Webinar	**Compliance assessment - timeline concerns** Industry raised concerns around the timeline for customers (particularly non-data centres) to assess their ability to comply.	
26 Nov 2025	5th Industry Webinar	**Compliance assessment - timeline concerns** Customers communicated that the timeline for them to engage with OEMs on technical solutions was insufficient.	
26 Nov 2025	5th Industry Webinar	**Volume of Non-Compliant Demand Facilities** Customers raised a concern that a high risk of widespread non-compliance would result from application of the requirements to all existing Demand Facilities.	
14 Jan 2026	6th Industry Webinar	**Ability for Non-Compliant Demand to Grow** Industry expressed concern that demand deemed non-compliant would be unable to grow under the proposed arrangements.	EirGrid clarified that MPID345-compliant demand may continue to grow within contractual limits, while non-MPID345-compliant demand will be under a threshold until compliant solutions are implemented.
14 Jan 2026	6th Industry Webinar	**Regulatory Approval and Implementation Timeline** Industry queried how urgent the proposal is, when regulatory approval would be sought, and how quickly the utilisation threshold would be implemented.	EirGrid responded that the issue is time-critical and that regulatory approval is being sought in the near future. Subject to approval, the utilisation threshold would take effect on the effective date of the modification.
14 Jan 2026	6th Industry Webinar	**Transparency and Time to Assess Business Impacts** Customers communicated their concern that the information was complex, materially important to business operations, and delivered too quickly to allow for proper assessment.	Confirmation was provided by the TSO that the presentation materials would be shared and that further engagement sessions could be facilitated. Subsequent industry webinars and extended feedback periods were facilitated.
14 Jan 2026	6th Industry Webinar	**Post-Derogation Arrangements**	EirGrid provided clarity around the utilisation threshold; that it is applied only during the derogation period.

Date	Source	Industry Feedback	EirGrid's Response/Action
		There were queries from customers as to whether the utilisation threshold would remain after the derogation period, or if it would be removed once the derogation ends.	Arrangements beyond that period will depend on further analysis, risk assessment, a TSO recommendation and CRU approval.
14 Jan 2026	6th Industry Webinar	**Treatment of new Demand Facilities** A query was raised in relation to how new Demand Facilities connecting to the transmission system would be treated under the compliance and derogation framework.	EirGrid subsequently developed the following proposal. Any new Demand Facility that connects to the transmission system before the end of 2026 will be offered the opportunity to avail of the appropriate 'group' process. The 24-month derogation period allowed under the group process will continue to run from the effective date of MPID345.
14 Jan 2026	6th Industry Webinar	**Volume of Compliance and Derogation Applications** Industry raised concerns that the proposal could result in a very large number of compliance assessments and derogation requests, exceeding processing capacity.	The risk was recognised by EirGrid and has informed our proposal to extend the derogation timeframe and the proposal to prioritise assessments by grouping Demand Facilities. These proposals will enable more efficient processing of compliance/derogations by EirGrid and CRU as assessments/decisions will be phased and over a longer overall period.
14 Jan 2026	6th Industry Webinar	**Technical Evidence Required for Compliance** Industry requested clarity on the studies and data required to demonstrate compliance, including whether load flow, protection settings, or modelling are necessary.	EirGrid communicated to industry that they will provide customers with a document that sets out the technical details of the analysis required to demonstrate compliance.
14 Jan 2026	6th Industry Webinar	**Effectiveness of a Derogation Based Approach** Customers raised concerns on the overall effectiveness of derogations, arguing that a Grid Code modification which results in non-compliance and a need to seek derogations is inefficient and not sufficiently consultative.	EirGrid proposed a Framework that allows customers to avail of a derogation from MPID345 for an extended period while requiring progress on the development of compliance plans.

Date	Source	Industry Feedback	EirGrid's Response/Action
19 Jan 2026	7th Industry Webinar	**Compliance Process Timelines** Industry highlighted that the proposed 12-month compliance period may be insufficient, particularly for existing live facilities. Key constraints highlighted by industry include equipment manufacture and testing, installation and commissioning timelines, limited availability of specialist resources, and the risks associated with intrusive works on critical operational sites.	EirGrid proposed extending the group derogation period from 12 to 24 months.
19 Jan 2026	7th Industry Webinar	**Ride Through and Fault Performance Requirements** Industry sought clarification on the practical expectations during voltage dips and short duration faults, particularly for facilities with sensitive equipment or large motor loads, and how compliance should be demonstrated.	It was stated by EirGrid that facilities are expected to remain connected during faults and restore demand rapidly once voltage recovers. Requirements are defined by the Fault Ride Through curve, with ride through only mandated for voltage dips within specified limits. To support the work of Demand Facilities in assessing their compliance with the proposed MPID345 requirements, EirGrid has developed study assessment guides to inform the modelling and simulations work that should be undertaken and the outputs required. Two study assessment guides have been developed: 1. Fault Ride Through (FRT) / Active Power Recovery (APR) Study Assessment Guide for Demand Facilities 2. Rate of Change of Frequency (RoCoF) Study Assessment Guide for Demand Facilities
19 Jan 2026	7th Industry Webinar	**Demand Utilisation Threshold* - 2025 Historic Data** Several attendees noted that the Demand Utilisation Threshold was proposed to be based on a User's 2025 usage. However, they noted that in some cases, a Demand User's utilisation may have been higher in 2024 and queried if this would be	EirGrid's analysis has shown that a small number of data centre Demand Facilities had a higher peak demand in 2024 than 2025. However, it is EirGrid's view that demand utilisation data from calendar year 2025 represents a more reflective demand utilisation profile for these data centres and is also more representative of the forecast demand utilisation

Date	Source	Industry Feedback	EirGrid's Response/Action
		taken into consideration as part of the Demand Utilisation Threshold calculation.	pattern of these data centres. Using 2024 demand utilisation data for these Demand Facilities would, in EirGrid's view, unfairly distort the overall allocation of 'headroom' across Demand Facilities.
11 Feb 2026	8th Industry Webinar	**Demand Utilisation Threshold** Customers expressed concerns around the potential issues associated with an absolute threshold.	EirGrid communicated that the demand utilisation threshold has been updated to account for peaks.
11 Feb 2026	8th Industry Webinar	**Operational measures and batteries charging limit restriction** Industry raised concerns that the current restriction requiring battery units to keep their State of Charge below 85% may remain in place.	EirGrid responded to industry that this limit is still required for system security, and no immediate change is expected. Lifting this restriction will depend on the compliance progress by Demand Facilities.
11 Feb 2026	8th Industry Webinar	**Commercial and technical feasibility** A number of customers stated that the proposed requirements and thresholds may not be technically or commercially feasible, especially for facilities that do not control their IT load.	EirGrid clarified that our role is to define system security requirements; individual engagement will continue to clarify technical aspects.
11 Feb 2026	8th Industry Webinar	**Portfolio/headroom and offsite solutions** Customers queried whether, since headroom created by one compliant site can be relocated to another site owned by the same company, an offsite battery could similarly be used to provide post-fault demand recovery.	EirGrid responded that the Grid Code requirements apply at the individual Demand Facility level, while the threshold can be managed on a portfolio basis across sites. Offsite batteries are not a feasible technical solution for post-fault recovery due to the required speed of response.
11 Feb 2026	8th Industry Webinar	**Demand Utilisation Threshold** Industry raised a question regarding how the threshold will be calculated and how compliance will be monitored (e.g. monthly average vs absolute threshold).	EirGrid communicated to industry that the threshold is based on the highest monthly average demand from 2025 with the additional margin allocated, and that the threshold will be expressed as an absolute value, although the Framework will allow for some temporary peaks.

Date	Source	Industry Feedback	EirGrid's Response/Action
11 Feb 2026	8th Industry Webinar	**Rationale for splitting Demand Facilities into two groups (Group A/B)** Industry queried why Demand Facilities are being divided into two groups and why the demand utilisation threshold applies only to data centres.	EirGrid responded to industry that data centres currently represent the largest share of transmission connected demand and their load behaves very differently during system faults compared with other facilities. The grouping is based on the distinguishing electrical characteristics of these types of Demand Facility, comparisons of observed performance during past fault events and Data Centre Demand Facility modelling.
11 Feb 2026	8th Industry Webinar	**Consequences for breaching the demand utilisation threshold** Industry raised a question regarding what the consequences would be if a site breaches the demand utilisation threshold, especially where the Demand Facility owner may not have full control over their own load.	EirGrid responded that a breach of a derogation condition is a breach of Grid Code and that EirGrid will consider actions available to it.
12 Mar 2026	9th Industry Webinar	The purpose of this webinar was for EirGrid to set out updated Framework proposals, informed by previous industry feedback, prior to submission to CRU.	The update included the introduction of a 'demand utilisation threshold' approach to managing non-MPID345-compliant demand levels in place of the 'absolute cap' approach previously proposed.

Table 2 Industry Feedback

** The methodology for the Demand Utilisation Threshold had yet to be defined. This was previously referred to as the Demand Utilisation Cap.*

We have taken industry feedback onboard and have used it to further develop the compliance and derogation process, demand utilisation threshold and guidance notes for industry, including by:

1. Allowing all Demand Facilities to avail of a group derogation option;
2. Allowing for an extended derogation period of 24 months;
3. Grouping Demand Facilities to allow better prioritisation within the Framework; and
4. Providing for extended compliance plan submission periods for non-data centre Demand Facilities.

These proposals will provide customers with more certainty around their treatment with respect to compliance and more time to engage with OEMs to develop solutions and compliance plans.

For the avoidance of doubt, the proposals set out in this Framework take precedence over the content of any slides or information otherwise provided at engagements including industry webinars and bilateral engagements.

3. Compliance and Derogation Framework

3.1 Background

As identified in the EirGrid Grid Code Modification Proposal Form, MPID345[3], there is an urgent need to address the system security issues presented by Demand Facilities' collective fault response, as the power system is approaching a limit to the level of demand loss that can be securely accommodated. EirGrid therefore requires mechanisms to manage the risk to the power system pending Demand Facilities achieving full compliance with the new requirements introduced by MPID345.

As set out in the introduction to this Framework, bringing forward MPID345 within the proposed Framework outlined in this document will support EirGrid's ability to manage the current issue while allowing Demand Facilities to assess and progress compliance in a timely manner. The key benefits of the streamlined 'group' approach set out in the proposed Framework are:

- An effective date for MPID345 falling five weeks after CRU approval will allow time for Data Centre Demand Facility owners to seek a streamlined derogation, for EirGrid to review applications and make recommendations, and for CRU to approve or reject streamlined derogations.
- The option of a conditional, 24-month derogation for all existing Demand Facilities which will provide time for Demand Facility owners to achieve compliance with MPID345.
- The ability for EirGrid to manage the risk to system security through a targeted demand utilisation threshold ('DUT').
- The 24-month derogation period referred to above will allow time for Demand Facilities to prepare and submit compliance plans and for EirGrid and CRU to carry out their respective assessments, recommendations and decisions in respect of compliance plans and any further derogation requests.

3.2 Compliance with the Grid Code and Overview of Compliance and Derogation Processes

All Demand Facilities with a Transmission Connection Agreement are required to comply with the Grid Code (including any amendments), insofar as the Grid Code is applicable to them. By default, a Modification to the Grid Code becomes binding on Demand Facilities from the date specified in the CRU Modification approval notification. To date there has been c.350 proposed amendments to the Grid Code.

Derogations are provided for under GC.9 of the Grid Code. Under GC.9.1 of the Grid Code, if a Demand Facility finds that it is, or will be, unable to comply with any provision of the Grid Code, then it is required to report such non-compliance to the TSO without delay and (subject to the provisions of the relevant derogation procedure) make such reasonable efforts as are required to remedy such non-compliance as soon as reasonably practicable. GC.9.1.2 provides that if the Demand Facility believes either that it would be unreasonable (including cost and technical considerations) to require it to remedy such non-compliance or that it should be granted an extended period to remedy such non-compliance, it shall promptly submit a request for a derogation to the TSO.

The relevant derogation procedure is set out at GC.9.3.3. A request for a derogation is made by submission of a derogation application form. Where Demand Facility owners do not avail of the streamlined 'group' derogation process (whereby they have 3 months/12 months from the Grid Code

[3] MPID345-Grid-Code-Modification-Proposal-Form.pdf

Modification effective date to submit their compliance plans, outlined in further detail below), the derogation application form should be accompanied by a plan to achieve compliance with MPID345.

In its consideration of a derogation request by a Demand Facility, the TSO may contact the relevant Demand Facility to obtain clarification of the derogation request, or to obtain further information regarding the request, or to discuss changes to the request. Once the derogation request has been validated by the TSO, a reference number is assigned.

The TSO will then assess the derogation request and provide to the CRU an assessment and a recommendation.

On receipt of a derogation assessment and recommendation from the TSO, the CRU will consider the derogation request, the TSO's assessment and the TSO's recommendation. In its consideration of a derogation request by a Demand Facility, the CRU may contact the relevant Demand Facility and/or the TSO to obtain clarification of the request, or to obtain further information regarding the request, or to discuss changes to the request.

Provided that the CRU considers that the grounds for the derogation are reasonable, then the CRU shall grant such derogation unless the derogation would, or it is likely that it would, have a materially adverse impact on the security and stability of the Transmission System operated by EirGrid or the Transmission System operated by SONI in Northern Ireland or impose unreasonable costs on the operation of the Transmission System or on other users.

The above is the standard Derogation Application approach as set out in the Grid Code. In this case, as EirGrid anticipates that there will initially be an inability to comply with the proposed requirements across most existing transmission connected Demand Facilities as technical solutions remain under development, EirGrid is proposing a streamlined 'group' derogation application process, the details of which are set out in the below sections.

3.3 Overview of Proposed Compliance and Derogation Framework

EirGrid is recommending to CRU that MPID345 is approved with an effective date falling five (5) weeks after the date of CRU approval. This five-week period before MPID345 comes into effect will allow time for transmission connected Demand Facilities to seek a derogation in the form of the TSO proposed streamlined conditional, time-limited derogation (referred to below as a 'group' derogation).

The following provides an overview of the Framework proposal:

- All Demand Facilities will be required to either demonstrate compliance with MPID345 or seek a derogation, in each case on an individual Demand Facility basis.
- For those Demand Facilities seeking a derogation, there are three options outlined within the Framework, each with its own timelines and conditions, and each Demand Facility must opt for one of these options, as applicable:
    - A group compliance and derogation process for Data Centre Demand Facilities connected before the end of 2026,
    - A group compliance and derogation process for Non-Data Centre Demand Facilities connected before the end of 2026,

    and,

    - A non-group compliance and derogation process open to all Demand Facilities who do not wish to avail of the standard terms and conditions proposed by EirGrid.
- The group compliance and derogation processes for Data Centres and Non-Data Centres will provide for a 24-month derogation from the MPID345 requirements.

- The group compliance and derogation process for Data Centre Demand Facilities will include the application of a Demand Utilisation Threshold (DUT) which will apply to each Data Centre Demand Facility. The DUT will set a limit on the monthly average non-compliant demand utilisation (in MVA) at each Data Centre Demand Facility, which will allow for some temporary peaks. The details in relation to the DUT are outlined in Section 4 below.
- The DUT may be revised by CRU should a material change in circumstances arise in accordance with GC.9.1.4 of the Grid Code.
- Data Centre Demand Facilities which can demonstrate full compliance with MPID345 requirements accordance with section 6 (i.e. that do not require a derogation) may utilise up to their full contractual MIC and will not be subject to a separate DUT. Data Centre Demand Facilities with a portion of MPID345-compliant demand may utilise that portion of their demand with no derogation-imposed limitations, but that portion of their demand which is not compliant with MPID345 will require the Demand Facility owner to seek a derogation, and that portion of their demand will be subject to a DUT.
- Under the group compliance and derogation process for Data Centre Demand Facilities, where a Data Centre Demand Facility owner has a portfolio of Data Centre Demand Facilities (i.e. where a Data Centre Demand Facility owner is the counterparty to a number of Transmission Connection Agreements with EirGrid in respect of more than one Data Centre Demand Facility, or where several Data Centre Demand Facilities are wholly-owned by the same parent company), the Data Centre Demand Facility owner (or parent company, as applicable) may manage the DUT of each Demand Facility on an aggregated, rather than a per-Demand Facility, basis. This 'portfolio' approach is further outlined in Section 4.4 below.

The Framework is outlined in more detail in the following sections.

3.4 Group / Non-Group Processes

As outlined above, EirGrid proposes that the Framework will allow for three derogation options:

- A group compliance and derogation process for Data Centre Demand Facilities connected before the end of 2026,
- A group compliance and derogation process for Non-Data Centre Demand Facilities connected before the end of 2026, and
- A non-group compliance and derogation process open to all Demand Facilities who do not wish to avail of the standard terms and conditions proposed by EirGrid.

This data centre / non-data centre categorisation of Demand Facilities is based on:

- The distinguishing electrical characteristics of these types of Demand Facility,
- Comparisons of observed performance during past fault events,
- Data Centre Demand Facility modelling.

As an alternative to the group derogation, all Demand Facilities may choose to follow a non-group (standard) derogation process. However, there are risks with this standard (non-group) approach, which are set out in Section 3.4.3 below.

All Demand Facilities will ultimately be required to demonstrate compliance with MPID345 or achieve a derogation from these requirements, irrespective of which process is followed.

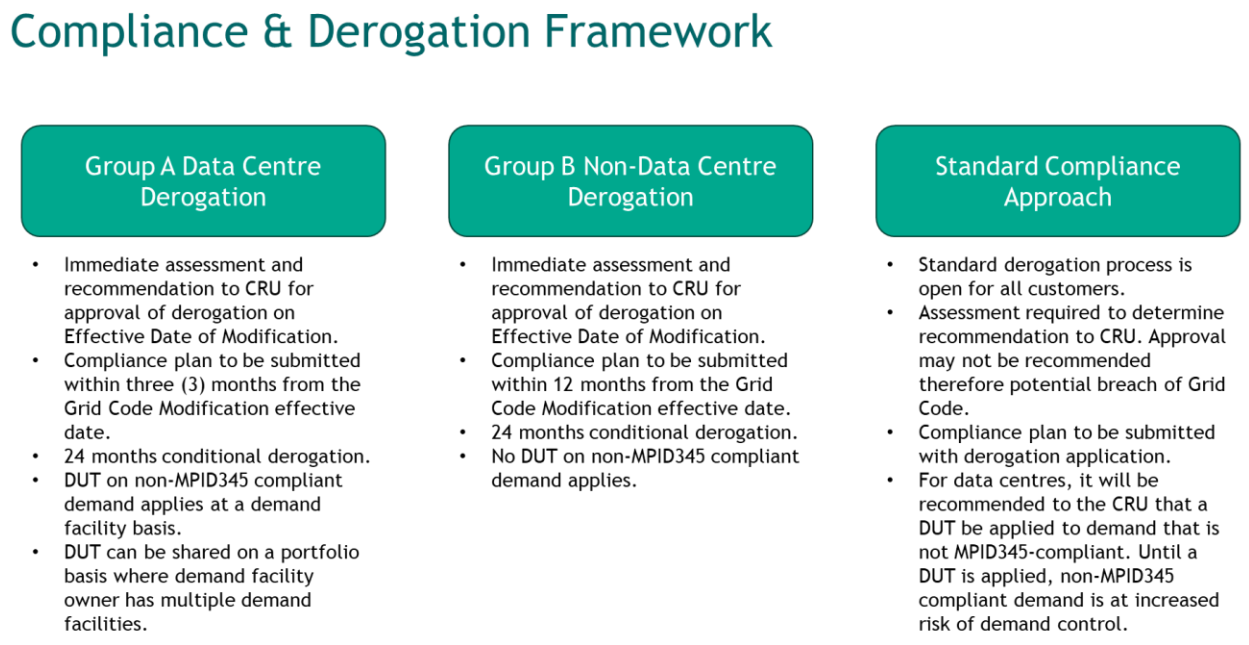

Figure 1 Overview of Compliance and Derogation Framework

The following sections set out the proposed terms and conditions to be associated with each of these three options.

3.4.1 Group A - Data Centre Compliance and Derogation Process

EirGrid proposes that all transmission connected Data Centre Demand Facilities (either already connected or connecting before the end of 2026) will have the option of a conditional, time-limited derogation as follows:

Time-limited:

- Data Centre Demand Facilities will obtain a 24-month derogation from the MPID345 requirements. This period would commence on the modification effective date (five weeks from the date of CRU approval).
- Any further extension beyond the 24-month period will require a separate derogation application. Any EirGrid recommendation in support of future derogation applications would be subject to EirGrid's assessment of the Demand Facility's progress on achieving compliance with MPID345, as well as further analysis and risk assessment of the power system. Any separate derogation would also require CRU approval.

Conditional:

- The alternative provisions ("Conditions") proposed in respect of any derogation granted in respect of Data Centre Demand Facilities are set out in the Derogation Application Form at Appendix 1 and are summarised below:

1. Demand Utilisation Threshold ("DUT")

1. The portion of demand utilisation at the Demand Facility owner's Demand Facility which is not compliant with the requirements of MPID345 shall be subject to a DUT of a pre-determined MVA which shall be applied at the individual Demand Facility.

i) For the purposes of the Conditions, 'demand utilisation' means the actual demand consumed in MVA (at the connection point) by a Facility as opposed to the contractual Maximum Import Capacity (MIC).

ii) The DUT may be revised by CRU should a material change in circumstances arise in accordance with GC.9.1.4 of the Grid Code

2. The Demand Facility owner shall ensure that monthly average demand utilisation of non-compliant demand at the Demand Facility remains at or below the DUT. This requirement for monthly average non-compliant demand utilisation to remain within its DUT is absolute and applies regardless of any temporary peaks (whether those peaks required approval or otherwise).
3. The Demand Facility owner shall be permitted to exceed the DUT from time to time and on a temporary basis, subject to the following conditions:
   i) Nothwithstanding (i) and (ii) below, monthly average non-compliant demand utilisation remains at or below the DUT,
   ii) Any 'peaks' in demand utilisation exceeding the DUT shall not exceed the DUT plus 10 percent (e.g. a Demand Facility with a DUT of 100 MVA shall not exceed 110 MVA of demand utilisation on a temporary basis), except in the circumstances set out in point (iii) below, and
   iii) Where the Demand Facility owner anticipates a scenario requiring its Demand Facility to exceed the DUT by more than 10 percent (e.g. for testing purposes), the Demand Facility owner shall seek prior written approval from EirGrid and shall not exceed the DUT by more than 10 percent unless EirGrid has provided written approval. Any instance of demand utilisation exceeding the 'DUT plus 10 percent' threshold without written approval shall constitute a breach of the Conditions.
4. Where the Demand Facility owner is the counterparty to a number of Transmission Connection Agreements with EirGrid in respect of a number of Demand Facilities (or where several Demand Facilities are wholly-owned by the same parent company), the Demand Facility owner (or parent company, as applicable) may manage the DUT for each Demand Facility on a portfolio basis whereby the DUT for each Demand Facility may be aggregated and re-allocated between the Demand Facility owner's Demand Facilities, provided that:
   i) any such re-allocation from one Demand Facility to another shall not result in the recipient Demand Facility exceeding its existing contractual MIC, and
   ii) the Demand Facility owner shall seek and receive written approval from EirGrid in advance of any such re-allocation so that EirGrid is aware of and has approved the DUT that applies at each Demand Facility at any given time.

2. Compliance Plan

1. Within three (3) months from the Grid Code Modification effective date, the Demand Facility owner shall provide to EirGrid:
   i) a compliance plan setting out its detailed proposals and timeline to achieve full compliance with the requirements of MPID345 ("**Compliance Plan**") in line with EirGrid's Guidance Note on Compliance Plans (at Appendix 3), or
   ii) a justification paper setting out the evidence and rationale if compliance with MPID345 will not be achieved, together with a plan to minimise the extent of non-compliance.

3. Monitoring

1. The Demand Facility owner shall facilitate EirGrid's monitoring of compliance with the Conditions, to include the provision of status reports to EirGrid every three (3) months (and otherwise on EirGrid's request), outlining Demand Facility owner progress on

achieving compliance with MPID345 in accordance with the Demand Facility owner's Compliance Plan.

3.4.2 Group B - Non-Data Centre Compliance and Derogation Process

EirGrid proposes that the option of a group derogation be made available to all transmission connected Demand Facilities that are not Data Centres (either already connected or connecting before the end of 2026). This group derogation will be:

Time-limited

- Non-Data Centre Demand Facilities will obtain a 24-month derogation from the MPID345 requirements. This period would commence on the modification effective date (five weeks from the date of CRU approval).
- Any further extension beyond the 24-month period will require a separate derogation application. Any EirGrid recommendation in support of future derogation applications would be subject to EirGrid's assessment of the Demand Facility's progress on achieving compliance with MPID345, as well as further analysis and risk assessment of the power system. Any separate derogation would also require CRU approval.

Conditional

- The alternative provisions ("Conditions") proposed to apply in respect of any derogation granted in respect of Non-Data Centre Demand Facilities are set out in the Derogation Application Form at Appendix 1 and are summarised below.

1. **Compliance Plan**

1. Within 12 months from the Grid Code Modification effective date, the Demand Facility owner shall provide to EirGrid:

(i) a compliance plan setting out its detailed proposals and timeline to achieve full compliance with the requirements of MPID345 ("**Compliance Plan**") in line with EirGrid's Guidance Note on Compliance Plans (at Appendix 3), or a compliance plan setting out its detailed proposals and timeline to achieve full compliance with the requirements of MPID345 ("**Compliance Plan**") in line with EirGrid's Guidance Note on Compliance Plans (at Appendix 3), or

(ii) a justification paper setting out the evidence and rationale if compliance with MPID345 will not be achieved, together with a plan to minimise the extent of non-compliance.

2. **Monitoring**

1. The Demand Facility owner shall facilitate EirGrid's monitoring of compliance with the Conditions, to include the provision of status reports to EirGrid every three (3) months (and otherwise on EirGrid's request), outlining Demand Facility owner progress on achieving compliance with MPID345 in accordance with the Demand Facility owner's Compliance Plan.

The principal difference between this Non-Data Centre group derogation and that proposed for Data Centre Demand Facilities is that a Non-Data Centre Demand Facility with non-MPID345-compliant demand consumption will not be subject to a DUT.

The process and expected timelines for the group derogation process is outlined below.

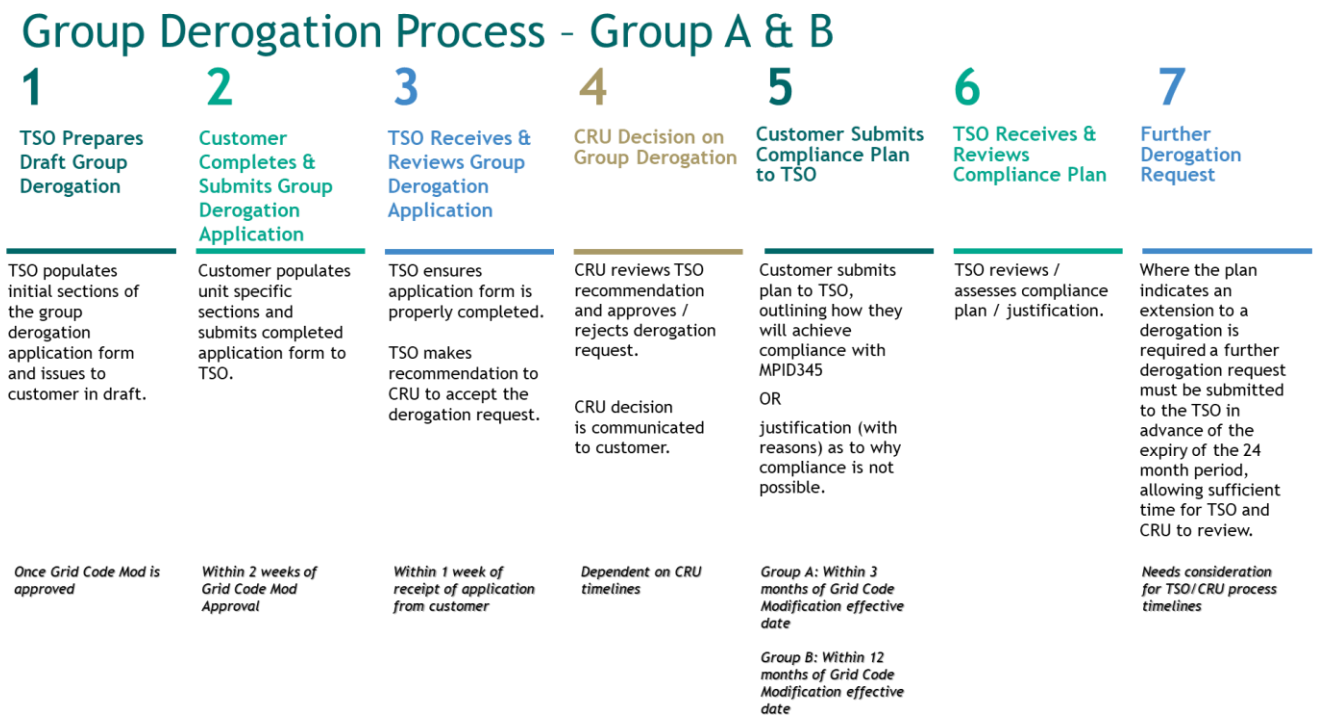

Figure 2 Group A and Group B Derogation Process

3.4.3 Non-Group Compliance and Derogation Process

In addition to the offer of a group derogation to Demand Facilities already connected or connecting before the end of 2026, all Demand Facilities are entitled to follow the standard Grid Code derogation process as set out in Grid Code Section GC.9, and as referred to in paragraph 3.2 above.

A Demand Facility that does not opt in to the proposed 'group' derogation process will not benefit from a streamlined recommendation from EirGrid to the CRU that their derogation be approved, subject to EirGrid firstly reviewing each of the group applications to ensure that they are correctly completed and within the requirements of the Framework.

EirGrid will assess each non-group compliance and derogation application on an individual basis and recommend that CRU either approve or reject each individual derogation request. While EirGrid will seek to assess these applications on an expedited basis, such assessment by EirGrid and then by the CRU will take more time than the group derogation process because these applications do not follow the streamlined approach, including because compliance plans are required to be provided and assessed as part of any non-group derogation request.

The time required for EirGrid to assess and make a recommendation to CRU on the derogation application will also be dependent on the quality of the application, including the compliance plan and mitigants, as well as CRU timelines to make a decision on the derogation.

Any non-group derogation application may take a number of months to be assessed and a decision issued.

As such, where a group derogation is not availed of, any non-group derogation application may not be assessed by EirGrid and then by CRU in advance of the Grid Code Modification effective date. There is also a risk that a non-group derogation application may not be recommended for approval by EirGrid or approved by CRU. A Demand Facility that has not received a positive decision on its non-group derogation application from CRU by the Grid Code Modification effective date is non-compliant with the Grid Code. In so far as it does not have a derogation, the Demand Facility's non-MPID345-compliant demand is at increased risk of demand control.

Any non-group Data Centre derogation application which EirGrid is recommending to CRU will include recommendation that a DUT is applied to demand that is not MPID345-compliant. The non-group derogation process is outlined below.

Non-Group Derogation Process

1

Customer Submits Derogation Request (including plan)

Customer submits derogation request to TSO if customer believes that;

1. it would be unreasonable (based on cost and technical considerations) to require customer to achieve compliance with FRT requirements,

   OR

2. customer should be granted extended period to achieve compliance and demonstrates the necessity for this based on a detailed compliance plan.

Before Grid Code Mod effective date

2

TSO Receives & Reviews Non-Group Derogation Request

TSO ensures application form is properly completed.
TSO makes recommendation to CRU to accept OR reject the derogation request.

N.B.

- EirGrid will recommend to CRU that, for Data Centres, a DUT is applied to non-MPID345 compliant demand
- TSO cannot guarantee derogations sought outside of the 'Group' derogation process will be recommended for approval. Each application will be assessed on its merits, however taking into account overall impact on power system security must be the priority.

Time to review and make recommendation is dependent on quality of plan /mitigants

3

CRU Decision on Non-Group Derogation Request

CRU reviews TSO recommendation and approves /rejects derogation request.

CRU's decision is communicated to customer.

Dependent on CRU timelines

Figure 3 Non-Group Derogation Process

Table 3 summarises the key features of the group and non-group compliance and derogation processes.

Comparison of Group / Non-Group Derogation Processes

#	Area	Group Derogation Process		Non-Group Derogation Process
		Group A - Data Centres	Group B - Non Data Centres	
1	Treatment of Non- MPID345-Compliant Demand Utilisation	Non-MPID345-compliant demand utilisation threshold at a Demand Facility / Portfolio level	No DUT applied.	• For Data Centres, it will be recommended to CRU that non-MPID345 compliant demand utilisation have a threshold at a Demand Facility / Portfolio level. Until DUT is applied non-MPID345-compliant demand at increased risk of demand control.
2	Automatic Granting of Derogation on Effective Date of Modification	Yes, for 24 months	Yes, for 24 months	No
3	Compliance Plan as part of Derogation Submission Timeframe *(i.e. time to submit plan from Mod. Effective date)*	3 months	12 months	Before Grid Code Modification Effective Date
4	Treatment of MPID345 Compliant Demand Utilisation	No restriction on MPID345-compliant demand utilisation up to Contractual Maximum Import Capacity (MIC)		
5	Contractual Maximum Import Capacity (MIC)	Not impacted by this process		

Table 3 Comparison of Group Derogation & Non-Group Derogation

3.4.4 Derogation Application Form

EirGrid has identified GC9-1-Non-Network-Codes-Plant-BESS-or-SCU-Derogation-Application-Form_1 as the most appropriate form of derogation application set out in the Grid Code.

For Demand Facilities following the group derogation process, parts of this form will be pre-populated by EirGrid. EirGrid will provide this pre-populated form to each Demand Facility post MPID345 approval by the CRU, containing the facility specific information required. Each Demand Facility will then need to complete and submit the form should it opt to avail of the group derogation. A draft of this pre-populated form is included at Appendix 1 for reference. Please note the text of the derogation conditions set out in the form.

Demand Facilities following the non-group derogation process should complete the unpopulated GC9-1-Non-Network-Codes-Plant-BESS-or-SCU-Derogation-Application-Form_1 which is available at EirGrid.ie[4]. This form is also included at Appendix 2 for reference.

[4] https://www.eirgrid.ie/grid/grid-codes-and-compliance/grid-code#Derogations

4. Demand Utilisation Threshold

4.1 Overview

A key aspect of the proposed Framework is the setting of a DUT to limit non-MPID345-compliant demand so that the security of the power system can be maintained while Demand Facilities progress towards compliance.

It is proposed that a DUT will be determined for each Data Centre Demand Facility. The DUT will set a fixed monthly average MVA limit on non-MPID345-compliant demand at each Data Centre Demand Facility, while allowing some scope for limited peaks above this threshold (the extent of such peaks is described in further detail at section 4.2 below).

The DUT may be revised by CRU at any time should a material change in circumstances arise, in accordance with GC.9.1.4 of the Grid Code.

Data Centre Demand Facilities which can demonstrate full compliance with MPID345 requirements in accordance with section 6 can continue to utilise demand up to their contractual MIC and this MPID345-compliant demand will not be subject to a DUT.

For Data Centre Demand Facilities with demand that is partially MPID345-compliant and partially non-MPID345-compliant, the DUT will apply to the non-compliant portion and the compliant portion will not be subject to a DUT. Note however, for the avoidance of any doubt, that the total demand utilisation of the Demand Facility, comprising compliant and non-compliant demand, can not exceed the contractual MIC.

This section sets out:

- the rules for DUT application,
- methodology for determining DUTs, and
- how portfolio-level aggregation of DUTs may apply.

4.2 Application of the Demand Utilisation Threshold

A DUT will be determined for each transmission connected Data Centre Demand Facility.

A DUT will apply to all Data Centre Demand Facilities seeking a derogation via the Group A process outlined above. For Data Centre Demand Facilities that opt for the non-group derogation outlined in Section 3.4.3 above, EirGrid will recommend to the CRU that a DUT also be applied to their Demand Facility.

The DUT will set a monthly average MVA limit on non-MPID345-compliant demand at the Demand Facility. This 'monthly average' approach will allow for temporary peaks above the DUT, provided that:

1. **Monthly-Average Compliance (Absolute Limit)**

   Monthly average demand utilisation of non-compliant demand at the Demand Facility must remain at or below the DUT. This requirement for monthly average demand utilisation of non-compliant demand to remain within the DUT is absolute and is not affected by any temporary peaks described in either point 2 or point 3 below. Demand Facility owners remain responsible at all times for ensuring their MVA monthly average demand utilisation of non-MPID345-compliant demand remains within the DUT.

2. **Temporary peaks up to +10%**

   The Demand Facility owner may temporarily exceed the DUT by up to 10 percent without prior approval, provided the monthly average non-MPID345-compliant demand utilisation remains within the DUT.

3. **Peaks >10% require prior written approval**

Where the Demand Facility owner anticipates a requirement for demand utilisation to exceed the DUT plus 10 percent, they must seek and obtain prior written approval from EirGrid. Once EirGrid approval has been granted, the Demand Facility owner may exceed their DUT by more than 10 percent, provided that the monthly average non-MPID345-compliant demand remains within the DUT.

Example

A Data Centre Demand Facility with a DUT of 100 MVA may temporarily peak to 110 MVA without EirGrid approval but, should the Demand Facility owner wish to peak in excess of 110 MVA (i.e. DUT plus 10 percent) on a temporary basis, they must receive prior written approval from EirGrid to do so. In all cases, their monthly average non-MPID345-compliant demand must remain at or below 100 MVA.

For the avoidance of doubt, any exceedance of the 'DUT plus 10 percent' threshold that occurs without prior written approval – whether anticipated, unanticipated, accidental, unintended or caused by operational or equipment issues – shall constitute a breach of the derogation conditions.

Where the monthly average non-compliant demand utilisation of a Data Centre Demand Facility exceeds the DUT for that facility, that shall constitute a breach of the derogation conditions.

4.3 Determining the Demand Utilisation Threshold

It is proposed that the DUT for each Data Centre Demand Facility reflects historic demand utilisation levels (highest monthly-average 2025 demand), plus a pro-rata allocation of any remaining headroom for non-MPID345-compliant demand that can be securely accommodated on the power system.

The following sections set out the methodology for both determining any potential headroom and how this headroom would be allocated.

4.3.1 Aggregate Power System DUT

EirGrid and SONI have determined a 'Load Rejection' limit for the all-island power system. This is published in EirGrid and SONI's Weekly Operational Constraints Update, the latest version of which can be found on the SEMO website[5]. This represents the limit of instantaneous demand loss for which the power system can be secured for a credible fault event.

This load rejection is the summation of demand losses and any HVDC Interconnector export loss, that could occur for a single credible contingency. To remain within the limit, HVDC exports have been reduced through countertrading between EirGrid / SONI and NESO (the GB electricity system operator).

However, as non-MPID345-compliant demand utilisation continues to increase we will soon reach a position that relevant HVDC Interconnector exports are reduced to zero and the load rejection is entirely made up of demand losses.

Based on model data provided by Data Centres, and EirGrid's simulations of credible power system fault events, we can determine a demand loss factor representing the proportion of Data Centre demand (transmission and distribution connected) that would not ride through a credible fault event. This demand loss factor sets the maximum, aggregate power system level of Data Centre demand utilisation (transmission and distribution connected) that can be accommodated to remain within the load rejection limit (assuming relevant HVDC Interconnector exports are reduced to zero).

4.3.2 Accounting For Distribution Connected Non-MPID345-Compliant Demand

As the proposed MPID345 and this Framework applies only to transmission connected Demand Facilities, allowance must be made for the impact of distribution connected Data Centres lying outside these arrangements pending the planned implementation of similar arrangements in the Distribution Code.

[5] General Publications | SEMO

We are continuing to engage with ESB Networks to understand the implications of the current and forecast data centre demand at distribution level. This is an input to the determination of the aggregate transmission system DUT.

4.3.3 Accounting For Peaks in Non-MPID345-Compliant Demand

As it is proposed that the DUT will be based on a monthly average of demand utilisation, there will be periods when the demand utilisation will peak above this average. To ensure that the overall power system level DUT is not exceeded, it is proposed that a margin to account for peaks is determined based on analysis of historic aggregate peaks above average demand utilisation levels.

4.3.4 Accounting For New Connections of Non-MPID345-Compliant Demand in 2026

It is assumed that any new transmission-connected Data Centre that is currently contracted and expected to be energised during 2026 will not initially be MPID345-compliant and will require a derogation. It is proposed to make an allowance for this non MPID345-compliant demand in determination of the aggregate transmission system DUT.

4.3.5 Determining the Aggregate Transmission System DUT

The resulting aggregate transmission system DUT is determined as the aggregate power system DUT less the distribution connected data centre demand utilisation allowance, less the peak margin, less the allowance for any new Data Centre connecting to the transmission system in 2026.

4.3.6 2025 Data Centre Demand Utilisation

EirGrid's operational demand utilisation data from the calendar year 2025 (15 minute resolution, spot MVA SCADA data) will be used to determine highest monthly average demand utilisation for each Data Centre Demand Facility.

4.3.7 Allocation of the Aggregate Transmission System Headroom across Demand Facilities

Any available headroom between the aggregate transmission system DUT and the aggregate 2025 highest monthly average Data Centre demand utilisation will be allocated on a pro-rata basis across Data Centre Demand Facilities.

Table 4 below summarises the calculations proposed to determine each Demand Facility's DUT. An illustrative example of the pro-rata allocation of 20 MVA of headroom across five demand facilities is also provided in Table 5.

Term	Calculation
Aggregate Power System DUT	= Load Rejection Limit ÷ Demand Loss Factor
Aggregate Transmission System DUT	= Aggregate Power System DUT - Distribution Connected Data Centre Demand Utilisation Allowance - Peak Margin - Future 2026 New Connection(s) Allowance
Aggregate Transmission System Headroom	= Aggregate Transmission System DUT - Aggregate 2025 Highest Monthly Average Utilisation
Demand Facility DUT	= Demand Facility 2025 Highest Monthly Average Utilisation + (Demand Facility 2025 Highest Monthly Average Utilisation ÷ Aggregate 2025 Highest Monthly Average Utilisation) x Aggregate Transmission System Headroom

Table 4 Proposed calculations to determine each Demand Facility's DUT

Demand Facility	Highest Monthly Average Demand Recorded in 2025 (MVA)	Demand Utilisation Threshold (MVA)	Delta (MVA)
A	20.0	21.1	1.1
B	50.0	52.6	2.6
C	60.0	63.2	3.2
D	100.0	105.3	5.3
E	150.0	157.9	7.9
Total	**380.0**	**400.0**	**20.0**

Table 5 Illustrative example of the pro-rata allocation of 20 MVA of headroom across five demand facilities

4.4 Portfolio approach to demand utilisation threshold

To reduce the operational impact on Data Centre Demand Facility owners and parent companies with multiple Demand Facilities, EirGrid is proposing that a 'portfolio' approach may be applied.

4.4.1 Application at the Connection Point

The DUT applies at the connection point for a given Demand Facility (as set out in that Demand Facility's Connection Agreement, not at individual building or hall level.

A Data Centre Demand Facility owner may redistribute the DUT across internal loads (building/halls) as long as the total non-MPID345-compliant demand at the connection point remains within the DUT.

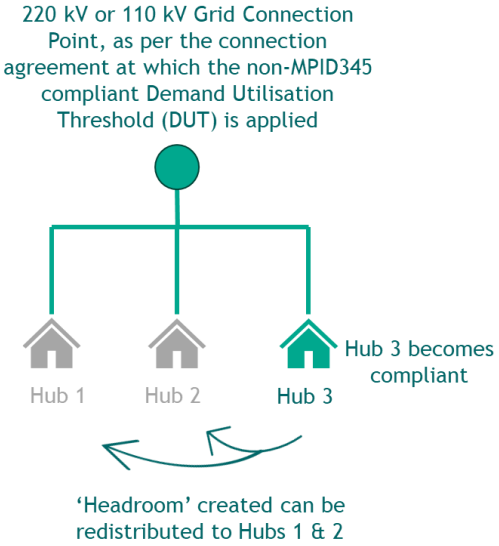

Figure 4 Application of non-MPID345-compliant DUT at the Connection Point, as per Transmission Connection Agreement

4.4.2 Portfolio-Level Reallocation Across Demand Facilities

Where a Data Centre Demand Facility owner is the counterparty to a number of Transmission Connection Agreements with EirGrid in respect of a number of Demand Facilities, or where several Data Centre Demand Facilities are wholly owned by the same parent company, the Demand Facility Owner (or parent company, as applicable) may manage the DUT of each Demand Facility on a portfolio basis whereby the DUT for each Demand Facility may be aggregated and re-allocated between its Demand Facilities. This is set out in Figure 5 and in the following:

- If a Data Centre Demand Facility owner reduces non-MPID345-compliant demand at one Demand Facility, the Data Centre Demand Facility owner may redistribute the resulting 'headroom' in the DUT across its other Demand Facilities.
- The Data Centre Demand Facility owner has flexibility to redistribute DUT allowance among its Demand Facilities, as long as the total non-MPID345-compliant demand summed across the various Demand Facilities stays within the sum of the DUTs for all its Demand Facilities and that any such re-allocation from one Demand Facility to another does not result in the recipient Demand Facility exceeding its existing contractual MIC.
- This gives Data Centre Demand Facility owners flexibility across their wider portfolio of Demand Facilities while remaining in compliance overall with the DUT derogation condition during the period that the derogation applies.
- The Data Centre Demand Facility owner shall be required to seek and receive written approval from EirGrid in advance of any re-allocation of DUT to ensure that EirGrid is aware of the DUT that applies at each Demand Facility at any given time. This information, to include evidence that the Demand Facility qualifies for this portfolio-level approach, should be included alongside the Derogation application form, or via separate request at a later date if the Demand Facility owner does not wish to seek to avail of the portfolio approach immediately.

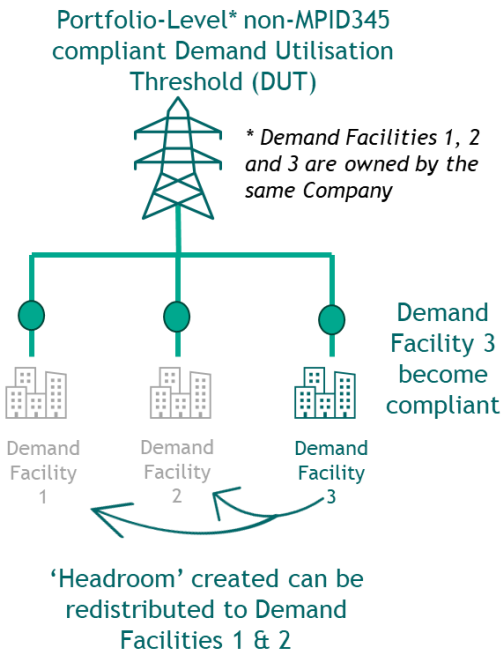

Figure 5 Portfolio-Level Application of the Threshold

5. Monitoring

5.1 EirGrid will monitor compliance with the Conditions of each derogation. This will include tracking the timely submissions of Compliance Plans in line with specified timeframes. For Group A (Data Centre Demand Facilities), this shall also include monitoring of compliance with (i) the DUT, (ii) the requirement to seek prior written approval from EirGrid for any re-allocation of DUT on a portfolio basis, (iii) the requirement to seek prior written approval from EirGrid for any demand utilisation peaks more than 10 percent above the DUT.

5.2 The process for monitoring compliance with the DUT and peaks is as follows:

1. EirGrid will monitor each Data Centre Demand Facility / Demand Facility portfolio's compliance with their monthly average DUT, and peaks above the DUT on a monthly basis. As stated above, the requirement for Demand Facility owners to remain within their monthly average DUT is absolute, regardless of any temporary peaks (whether those peaks required approval or otherwise).
2. Monthly average demand utilisation of non-MPID345-compliant demand and any peak(s) in demand utilisation more than 10 percent above the DUT for each Data Centre Demand Facility / Demand Facility portfolio will be determined using EirGrid's operational data (15 minute spot MVA data). For the avoidance of doubt, this determination will account for any split in MPID345-compliant and non-MPID345-compliant demand on a Demand Facility / portfolio basis.
3. EirGrid will cross-reference (i) demand utilisation data at each Demand Facility generally and (ii) demand utilisation data regarding peaks at Demand Facilities greater than 10 percent above the DUT, against (i) approved re-allocation of DUT on a portfolio basis and (ii) permissions sought and granted to Demand Facility owners for peaks above 10 percent of DUT.
4. EirGrid will treat any instance of non-compliant demand utilisation exceeding the DUT on a monthly average basis, non-compliant demand utilisation exceeding the 'DUT plus 10 percent' threshold for peaks without written approval and any use of the 'portfolio level' approach without prior EirGrid approval, as a breach of the derogation conditions.
5. EirGrid will notify Demand Facility owners of the outcome of this analysis within two weeks of the end of each month.
6. Any Demand Facility who seeks to query this analysis shall submit their response to EirGrid within two weeks of EirGrid's notification.

5.3 The process for monitoring compliance plans is as follows:

- Where a Demand Facility has submitted their Compliance Plan and where this Compliance Plan is confirmed to be in line with EirGrid's Guidance Note on Compliance Plans attached at Appendix 3, the Demand Facility owner shall submit a status report every three (3) months (and otherwise in response to an EirGrid request) outlining their progress on achieving compliance with MPID345, in line with the Demand Facility's submitted compliance plan.
- A failure to submit a Compliance Plan (in line with EirGrid's Guidance Note on Compliance Plans) in time will be treated as a breach of the derogation conditions.

5.4 Breach of Alternative Provisions

All derogation applications are sought by a Demand Facility in accordance with the terms of GC.9 of the Grid Code.

In accordance with GC.9.1.3 of the Grid Code, should the derogation be granted by the CRU, the conditions of that derogation shall constitute 'alternate provisions' set forth in a derogation. Non-compliance with the Conditions, or any of one them, constitutes a breach of Grid Code. Under Clause 6.1 of the Transmission Connection Agreement General Conditions of Transmission Connection and Use of System (the "General Conditions"), a breach of Grid Code is deemed to be a material breach of the Transmission Connection Agreement.

Any such breach(es) may result in EirGrid taking measures available to it under the Grid Code and/or under the Transmission Connection Agreement. In this regard, (without limiting EirGrid rights or remedies under the Grid Code or Transmission Connection Agreement or otherwise), General Conditions 8 (Breach of the Agreement) and 9 (Events of Default) particularly 9.1.2 and 9.3, of the General Conditions, and [OC.4.5.6 and OC.6.7.4] of the Grid Code, should be noted.

Separately and/or in the alternative, EirGrid may consider such a breach to be a material change of circumstance in accordance with GC.9.1.4 of Grid Code and request that the CRU initiate a review of the existing derogation, which may for example result in the withdrawal of the Demand Facility's derogation.

Real Time Monitoring and Demand Control Measures

Note that EirGrid will be carrying out real-time monitoring of individual Demand Facility demand utilisation. EirGrid may take immediate demand control action where necessary to protect the integrity and security of the power system.

6. Compliance Assessment

6.1 Overview

In order for a transmission connected Demand Facility to demonstrate compliance with a Grid Code requirement, technical studies (that model the behaviour of the facility in response to simulated events) and/or testing of facilities is typically required. Compliance assessments can be completed by Demand Facilities at any point and submitted to the TSO for review and approval.

In the case of the proposed MPID345 requirements, technical analysis is deemed appropriate given the nature of the requirements, although this analysis may be supported by the Demand Facility's own electrical testing of their equipment. No grid level electrical testing will be undertaken by EirGrid in respect of these requirements.

Demand Facilities will undertake a self-assessment of their compliance with the proposed MPID345 requirements and submit their assessment to EirGrid. EirGrid will then review this submission and notify the Demand Facility owner of its decision with respect to compliance.

6.2 Study Assessment Guides

To support the work of Demand Facilities in assessing their compliance with the proposed MPID345 requirements, EirGrid has developed study assessment guides to inform the modelling and simulations work that should be undertaken and the outputs required. Two study assessment guides have been developed:

1. Fault Ride Through (FRT) / Active Power Recovery (APR) Study Assessment Guide for Demand Facilities
2. Rate of Change of Frequency (RoCoF) Study Assessment Guide for Demand Facilities

Each of these guides sets out:

- Data requirements
- The type of analysis that should be undertaken
- The study methodology that should be followed
- The scenarios (type of faults / events) that should be simulated
- The simulation outputs required

A Demand Facility should submit their self-assessment of compliance to EirGrid. EirGrid will then review their submission, request additional information if required, and determine if compliance has been demonstrated to its satisfaction or not. EirGrid will then notify the Demand Facility of the outcome of this process and next steps. A Demand Facility shall not be deemed or considered to be compliant unless written notification of same is received from EirGrid.

These guides are included as part of this Framework submission to CRU.

6.3 Derogations Register

Under GC.9.3.4.1, the TSO is required to keep a register of all derogations which have been granted and to publish this register on the TSO's website.

EirGrid's Grid Code Derogations Register includes the following information in respect of each derogation:

- DAID number

- Identity of the User that submitted the derogation request
- Plant name
- Applicable Grid Code version, section and clause
- Period of the derogation
- Extent of compliance (which shall include a brief summary of the extent of non-compliance with provision(s) of Grid Code).

7. Appendix 1 - Group Derogation Application form (Pre-Populated)

The below is the sample pre-populated group derogation application. Items highlighted in yellow are for demand facility completion. EirGrid will provide this pre-populated form to each Demand Facility seeking derogation from MPID345, post MPID345 approval by the CRU, containing the facility specific information required. Each Demand Facility will then need to complete and submit the form. See Appendix 3 for further information on the details required in the compliance plan.

APPLICANT:	Company Name		
APPLICANT CONTACT NAME:	Contact Name	**DATE:**	dd/mm/yyyy
APPLICANT TELEPHONE NUMBER:	Telephone Number		
APPLICANT POSTAL ADDRESS:	Address Line 2 Line 3 EirCode	**APPLICANT E-MAIL ADDRESS:**	email@company.com
		DEROGATION APPLICATION NUMBER (EIRGRID USE ONLY)	
GRID CODE VERSION:	16.0		
GRID CODE CLAUSE FOR WHICH DEROGATION IS SOUGHT:	CC7.4.3.1 CC7.4.3.2		
PLANT/ SYSTEM FOR WHICH DEROGATION IS SOUGHT:	Demand Facility Name		
TOTAL INSTALLED CAPACITY (MW)	N/A		
MEC **(MW)**	N/A		
FINAL OPERATIONAL NOTIFICATION DATE	Connection Date = dd/mm/yyyy		
DATE OPERATIONAL CERTIFICATION ACHIEVED	N/A		
DESCRIPTION AND EXTENT OF NON-COMPLIANCE	The Applicant cannot comply with the new Rate of Change of Frequency (RoCoF), Fault Ride Through and Active Power Consumption recovery requirements outlined in Clauses CC.7.4.3.1 and CC.7.4.3.2.		

IMPACT ON THE ELECTRICITY SYSTEM OF NON-COMPLIANCE	The impact on the electricity system of non-compliance is set out by EirGrid in its information paper https://cms.eirgrid.ie/sites/default/files/publications/MPID345-Large-Demand-Facility-Fault-Ride-Through-Issue-and-Proposed-Solutions-EirGrid-and-SONI-Information-Paper-November-2025.pdf
REASON FOR NON-COMPLIANCE	Applicant's Plant unable to comply with modification #MPID 345 to Grid Code, which introduced Clauses CC.7.4.3.1 and CC.7.4.3.2.
THE END DATE OF THE REQUESTED DEROGATION APPLICATION	24 months from the date on which #MPID 345 becomes effective.
EFFORTS MADE TO IMPROVE/ACHIEVE/ MAXIMISE COMPLIANCE AND PROPOSAL FOR REMEDYING NON-COMPLIANCE. **PLEASE INCLUDE <u>MILESTONES AND DATES</u> FOR REMEDYING NON-COMPLIANCE, COSTS, AND RISK FACTORS THAT MAY DELAY COMPLIANCE.** **(THIS SECTION MUST BE FILLED OUT FOR ALL APPLICATIONS)**	The Applicant requests an additional period of time to assess the extent of its non-compliance and to formulate a proposal to remedy its non-compliance. The Applicant requests a full derogation from the requirements of Clauses CC.7.4.3.1 and CC.7.4.3.2 for a 24-month period and acknowledges that this will be on a conditional basis. For the avoidance of doubt, this Derogation is sought in accordance with the terms of Section GC.9 of the Grid Code. ` **Conditions** The Applicant shall accept and comply with the following alternative provisions as mandatory conditions of any derogation from the requirements of CC.7.4.3.1 and CC.7.4.3.2 ("Conditions"): **1. [Demand Utilisation Threshold ("DUT")[6]** a. The portion of demand utilisation at the Applicant's Demand Facility which is not compliant with the requirements of CC.7.4.3.1 and CC.7.4.3.2 shall be subject to a DUT of [XX] [7]MVA which shall be applied at the individual Demand Facility. i. For the purposes of the Conditions, 'demand utilisation' means the actual demand consumed in MVA (at the connection point) by a Facility as opposed to the contractual Maximum Import Capacity (MIC). ii. The DUT may be revised by CRU should a material change in circumstances arise in accordance with GC.9.1.4 of the Grid Code. b. The Applicant shall ensure that monthly average demand utilisation of non-compliant demand at the Demand Facility remains at or below the DUT. This requirement for monthly average demand

[6] This section on Demand Utilisation Thresholds (DUT) will be removed in advance of issuing to demand facilities following the non-group derogation process.
[7] This DUT figure will be populated by EirGrid in advance of issuing to demand facilities for completion.

utilisation of non-compliant demand to remain within its DUT is absolute and applies regardless of any temporary peaks (whether those peaks required approval or otherwise).

c. The Applicant shall be permitted to exceed the DUT from time to time and on a temporary basis, provided always that

i. Notwithstanding (ii) and (iii) below, monthly average demand utilisation of non-MPID345-compliant demand remains at or below the DUT,

ii. any 'peaks' in demand utilisation exceeding the DUT shall not exceed the DUT plus 10 percent (except in the circumstances set out in (c)(iii) below), and

iii. where the Applicant anticipates a scenario requiring its Demand Facility to exceed the DUT by more than 10 percent (e.g. for testing purposes), the Applicant shall seek prior written approval from EirGrid, and shall not exceed the DUT by more than 10 percent unless EirGrid has provided written approval. EirGrid shall treat any instance of demand utilisation exceeding the 'DUT plus 10 percent' threshold without written approval as a breach of the Conditions.

d. Where the Applicant is the counterparty to a number of Transmission Connection Agreements with EirGrid in respect of a number of Demand Facilities, or where the Applicant is one of several Data Centre Demand Facilities wholly owned by the same parent company, the Applicant (or parent company, as applicable) may manage the DUT for each Demand Facility on a portfolio basis whereby the DUT for each Demand Facility may be aggregated and re-allocated between the relevant Demand Facilities, provided that:

i. any such re-allocation from one Demand Facility to another shall not result in the recipient Demand Facility exceeding its existing contractual MIC, and

ii. the Applicant shall seek and receive written approval from EirGrid in advance of any such re-allocation so that EirGrid is aware of and has approved the DUT that applies at each Demand Facility at any given time.]

2. Compliance Plan

Within [three (3)] or [twelve (12)] [8]months from the effective date of Grid Code modification MPID345, the Applicant shall provide to EirGrid:

i. A compliance plan setting out its detailed proposals and timeline to achieve full compliance with the requirements of CC.7.4.3.1 and CC.7.4.3.2 in line with EirGrid's requirements ("**Compliance Plan**"), or

ii. a justification paper setting out the evidence and rationale if compliance with CC.7.4.3.1 and CC.7.4.3.2 will not be achieved, together with a plan to minimise the extent of non-compliance.

3. Monitoring

a. The Applicant shall facilitate EirGrid's monitoring of compliance with the Conditions, to include the provision of status reports to

[8] This will be populated by EirGrid in advance of issuing to demand facilities for completion and is dependent on if the facility is in group A or group B.

	EirGrid every three (3) months (and otherwise on EirGrid's request) outlining the Applicant's progress on achieving compliance with CC.7.4.3.1 and CC.7.4.3.2, in accordance with the Applicant's Compliance Plan.
DETAILS OF SUPPORTING DOCUMENTATION FOR APPLICATION (IF ANY) ATTACHED	**N/A**
Please submit the Derogation Application to derogationrequests@eirgrid.com	

8. Appendix 2 – Non-Group Derogation Application Form

See Appendix 3 for further information on the details required in the compliance plan.

APPLICANT:			
APPLICANT CONTACT NAME:		**DATE:**	
APPLICANT TELEPHONE NUMBER:			
APPLICANT POSTAL ADDRESS:		**APPLICANT E-MAIL ADDRESS:**	
		DEROGATION APPLICATION NUMBER (EIRGRID USE ONLY)	
GRID CODE VERSION:			
GRID CODE CLAUSE FOR WHICH DEROGATION IS SOUGHT:			
PLANT/ SYSTEM FOR WHICH DEROGATION IS SOUGHT:			

TOTAL INSTALLED CAPACITY (MW)	
MEC **(MW)**	
FINAL OPERATIONAL NOTIFICATION DATE	
DATE OPERATIONAL CERTIFICATION ACHIEVED	
DESCRIPTION AND EXTENT OF NON-COMPLIANCE	
IMPACT ON THE ELECTRICITY SYSTEM OF NON-COMPLIANCE	
REASON FOR NON-COMPLIANCE	
THE END DATE OF THE REQUESTED DEROGATION APPLICATION	

EFFORTS MADE TO IMPROVE/ACHIEVE/MAXIMISE COMPLIANCE AND PROPOSAL FOR REMEDYING NON-COMPLIANCE. **PLEASE INCLUDE <u>MILESTONES AND DATES</u> FOR REMEDYING NON-COMPLIANCE, COSTS, AND RISK FACTORS THAT MAY DELAY COMPLIANCE.** **(THIS SECTION MUST BE FILLED OUT FOR ALL APPLICATIONS)**	
DETAILS OF SUPPORTING DOCUMENTATION FOR APPLICATION (IF ANY) ATTACHED	
Please submit the Derogation Application to derogationrequests@eirgrid.com	

9. Appendix 3 – Compliance Plan Guidance Note

The compliance plan should include efforts made to improve, achieve or maximise compliance and proposals for remedying non-compliance. Please include milestones and dates for remedying non-compliance, and any risk factors that may delay compliance.

The table of milestones below includes the minimum level required to be completed for the compliance plan, please provide as much detail as possible. Where additional milestones and/or relevant information is not listed in the below please expand on the table to show the efforts to achieve compliance.

Overview of current compliance position, description of actions taken to date to achieve compliance and overview of plans to become compliant	

Milestone	Provide detail of approach E.g. overview of approach and compliance and risk factors that may delay compliance.	Due Date	Status (Not started/In Progress/ Complete)
Implementation of solution – Start Engagement with OEMs - Identify/Develop			
Implementation of solution – Complete Engagement with OEMs - Identify/Develop	*Include details on: Who has been engaged with and when*		
Implementation of solution: Start Solution Testing			
Implementation of solution: Complete Solution Testing			
Implementation of solution: Start Solution Roll-out			
Implementation of solution: Complete Solution Roll-out			
Submission of Compliance assessment 1 related to Fault Ride			

Through (FRT) / Active Power Recovery (APR)			
Submission of Compliance Assessment 2 related to Rate of Change of Frequency (RoCoF)			
***Additional milestone(s) - please add as required**			